

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
COUNTY, FLORIDA** **CIVIL ACTION**

Case No.

Plaintiff(s),

Case Type:

vs.

Defendant(s)

AGREED CASE MANAGEMENT PLAN AND ORDER

The parties hereby submit the following Agreed Case Management Plan to the Court for approval:

Case Track Assignment¹ (check one – must be completed for cases filed 1/1/10 or thereafter):

Expedited Track (Case resolved within 12 months);

(It is recommended that discovery and an alternative dispute resolution be completed within 270 days after the complaint is filed and a final disposition entered within 365 days after the complaint is filed)

Standard Track (Case is resolved within 18 months);

(It is recommended that discovery and an alternative dispute resolution be completed within 450 days after the complaint is filed and a final disposition entered within 540 days after the complaint is filed)

Complex Track (Case resolved within 2 years)

(Case will likely be declared complex per Florida Rule of Civil Procedure 1.201)

Case Deadlines and Events

<i>DEADLINE OR EVENT</i>	<i>AGREED DATE</i>
Statement of Facts and/or Counterclaim(s) <div style="text-align: right;">Plaintiff(s):</div> <div style="text-align: right;">Defendant(s):</div>	
Identification of facts the parties believe to be disputed <div style="text-align: right;">Plaintiff(s);</div> <div style="text-align: right;">Defendant(s):</div>	
Identification of the issues of law to be decided by the Court	
Motions to Add Parties or to Amend Pleadings	
Disclosure of Fact Witnesses <div style="text-align: right;">Plaintiff(s):</div> <div style="text-align: right;">Defendant(s):</div>	

¹ Case disposition times for all Case Tracks have been established in accordance with Florida Rule of Judicial Administration 2.250(a)(1)(B). Although Standard and Complex Track cases may or may not be resolved with a jury trial, it is expected that Expedited Track cases will be resolved without a jury trial.

<i>DEADLINE OR EVENT</i>	<i>AGREED DATE</i>
Disclosure of Expert Witnesses Plaintiff(s): Defendant(s):	
Filing of Exhibit List Plaintiff(s): Defendant(s):	
Discovery Deadline for Fact Witnesses (All discovery must be commenced in time to be completed before this date) Plaintiff(s): Defendant(s):	
Expert Opinion Available to Opposing Party (It is recommended that the last exchange occur 4 months before trial and 1 – 2 months before discovery deadline to allow time for expert depositions. This does not require a written report unless otherwise required by the rule.) Plaintiff(s): Defendant(s):	
Discovery Deadline for Expert Witnesses Plaintiff(s): Defendant(s):	
Completion of Alternative Dispute Resolution (ADR) (Mediation is mandatory unless the parties agree to another form of ADR. If early ADR is selected and it does not result in settlement or disposition of this entire action, a case management conference will be scheduled within 45 days from the date of ADR) Deadline: Type of ADR:	
Deadline for Filing Dispositive Motions (Court requires filing not later than 10 days prior to the pretrial management conference)	
Pretrial Conference Date (Unless early ADR is selected, a pretrial conference date will be scheduled within 45 days of the date of ADR not resulting in settlement or disposition of this entire action.)	An Order will be issued by the Court scheduling the Pretrial Conference.
Other Deadlines or Events	

Trial Information

<p>Estimated Date the Case Will Be Prepared To Go To Trial (If counsel and unrepresented parties do not agree on the estimated date on which the case will be prepared to go to trial, the Court may on its own motion set the case for trial)</p>	
<p>Estimated Length of Trial (<i>specify the number of trial days</i>):</p>	
<p>Identification of Jury or Non-Jury Trial</p>	

The above-referenced schedule of deadlines will be strictly adhered to by the parties unless a change is otherwise agreed to by the parties and approved by the Court. The Court will consider a request to approve changes to these deadlines upon a showing of good cause by either party based on matters arising from an emergency nature or unavailability. However, once the Agreed Case Management Plan has been approved by the Court, procrastination in completing discovery or the unavailability of counsel will not constitute good cause for a change to these deadlines. The failure to abide by these deadlines may result in sanctions by the Court, including the award of attorney’s fees, the striking of pleadings, and/or a dismissal of the action.

Date: _____

Signature, address and telephone number of Counsel and Unrepresented Parties. Counsel must state Fl Bar number:

 PLAINTIFF’S COUNSEL
 Address
 Telephone #
 Fax #
 E-Mail Address
 Florida Bar #

 DEFENDANT’S COUNSEL
 Address
 Telephone #
 Fax #
 E-Mail Address
 Florida Bar #

 Or, if pro se, PLAINTIFF
 Address
 Telephone #

 Or, if pro se, DEFENDANT
 Address
 Telephone #

ORDER APPROVING AGREED CASE MANAGEMENT PLAN

THE COURT having reviewed the preceding Agreed Case Management Plan and finding it to be satisfactory, it is

ORDERED AND ADJUDGED that the Agreed Case Management Plan is hereby **APPROVED AND ALL PARTIES SHALL ABIDE BY THE TERMS HEREIN.**

DONE AND ORDERED in _____, County, Florida on _____.

 , Circuit Judge

Copies furnished to:
Counsel of Record via Clerk's email
Any Pro Se parties via U.S. Mail by Judicial Assistant