IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR HENDRY COUNTY, FLORIDA

CIVIL ACTION

Plaintiff(s),

vs. CASE NO.

Defendant(s).

/

**AGREED CASE MANAGEMENT PLAN**

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

**Case Deadlines and Events**

|  |  |
| --- | --- |
| ***DEADLINE OR EVENT*** | ***AGREED DATE*** |
| **Statement of Facts and/or Counterclaim(s)**  Plaintiff(s):  Defendant(s): |  |
| **Identification of facts the parties believe to be disputed**  Plaintiff(s):  Defendant(s): |  |
| **Identification of the issues of law to be decided by the Court** |  |
| **Motions to Add Parties or to Amend Pleadings** |  |
| **Disclosure of Fact Witnesses**  Plaintiff(s):  Defendant(s): |  |

|  |  |
| --- | --- |
| ***DEADLINE OR EVENT*** | ***AGREED DATE*** |
| **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 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.)  Deadline:  Type of ADR: |  |
| **Deadline for Filing Dispositive Motions**  (Court requires filing not later than 10 days prior to the pretrial management conference) |  |
| **Pretrial Management Conference Date** | An Order will be issued by the Court scheduling the Pretrial Management Conference. |
| **Other Deadlines or Events** |  |

**TRIAL INFORMATION**

|  |  |
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| **Estimated Date the Case Will Be Prepared To Go To Trial**  **(**If counsel and/or 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) |  |
| **Estimated Length of Trial** *(specify the number of trial days):* |  |
| **Identification of Jury or Non-Jury Trial** |  |

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:*

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