

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

_____,)
)
Plaintiff(s),)
) Case No. _____
vs.) Division 18
)
_____,)
)
Defendant(s).)

SCHEDULING ORDER

Plaintiff(s) appear by _____.
Defendant(s) appear by _____.

NOW on this _____ day of _____, 20__, the Court being fully advised, and pursuant to the agreement by Counsel for the parties enters the following Scheduling Order:

1. The above cause is set for trial on _____, at 9:00 a.m. in Division 18 of the Jackson County Circuit Court. Trial is expected to last ____ days. This trial date is considered final and will not be continued without good cause and leave of the Court.
2. A pre-trial conference is set for _____, at _____ in Division 18 of the Jackson County Circuit Court. Any pre-trial matters, including but not limited to Motions in Limine, Deposition Designations, and proposed Jury Instructions must be filed prior to this date, as set forth below.
3. The parties shall participate in mediation, with a mediator of their choice, on or before _____. If the parties are unable to agree on a mediator, they shall so inform the Court and one will be appointed for them.
4. Plaintiff(s) shall designate all expert witnesses on or before _____.
5. Plaintiff(s) shall produce all expert witnesses for deposition on or before _____.
6. Defendant(s) shall designate all expert witnesses on or before _____.
7. Defendant(s) shall produce all expert witnesses for deposition on or before _____.
8. The deadline for filing motion(s) to amend is _____.
9. The deadline for filing motion(s) to add parties is _____.
10. All discovery shall be completed on or before _____.

11. All dispositive motions, especially motions for summary judgment, will be filed on or before _____. Summary judgment motions must be filed **no less than ninety (90) days prior to the trial date. Any dispositive motions filed less than ninety (90) days prior to the trial date will be taken with the case, unless the Court rules otherwise.** Motions for summary judgment that are not ripe before the trial date shall **not** serve as a basis for continuance.
12. Any of the above time deadlines may be changed by agreement of the parties without notice to the Court, as long as such changes do not affect the pre-trial conference and/or trial dates. Dispositive motion deadline changes should be made with the understanding that dispositive motions filed less than ninety (90) days prior to the trial date will be taken with the case. Any desire to make changes without agreement of the parties will require leave of Court. In the event that the parties choose to deviate from the Scheduling Order, such agreement should be documented by the parties. Disputes over agreements to change deadlines not documented will result in the strict enforcement of the contents of this Scheduling Order.
13. All Motions in Limine or other pretrial motions must be filed not later than **ten (10) days** before the pre-trial conference. Briefs in opposition to Motions in Limine must be filed not later than **three (3) days** before the pre-trial conference. These deadlines for Motions in Limine may not be changed without approval of the Court.
14. Parties shall file any designated portion of depositions to be read, shown or played to the jury by videotape **thirty (30) days before the pre-trial conference.** Objections to proposed deposition designations shall be filed **twenty (20) days before the pre-trial conference.** Counter-designations are due **ten (10) days before the pre-trial conference,** and objections to counter-designations are due **seven (7) days before the pre-trial conference.**
15. All proposed jury instructions (with MAI citations) must be emailed to the Division Law Clerk at least **one (1) day** prior to the pre-trial conference.
16. The failure of the parties to follow the dates set forth in the Order without prompt notice to the Court shall not serve as a basis for a continuance and in appropriate cases may serve as a reason for the Court to consider sanctions.
17. The parties should contact the Court prior to filing any written pleadings regarding discovery disputes. However, the Court should not be notified of a discovery dispute unless and until the parties have attempted to resolve the issue via phone call, video conference, or in-person discussion. In contacting the Court, the parties shall each **briefly** describe the discovery dispute via an e-mail to the Division Law Clerk. After a review of the dispute, the Court may request a motion, but it is hoped that the Court will be able to facilitate a resolution to any discovery dispute without further delay of motion and response time.

IT IS SO ORDERED.

Date: _____

Judge Kevin D. Harrell
Division 18

CERTIFICATE OF MAILING

It is hereby certified that copies of the foregoing were sent through the e-filing system on

_____.

Law Clerk