

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

_____ ,)	
)	
PLAINTIFF(S),)	
)	__ CV __
v.)	
)	DIVISION 5
_____ ,)	
)	
DEFENDANT(S).)	

SCHEDULING ORDER

Now on this ____ day of _____, 2012, the Court being fully advised, and pursuant to the agreement by counsel for the parties enters the following Scheduling Order:

Introduction

This Court, as well as the other judges of the 16th Judicial Circuit, are committed to the concept of case management. With that in mind, counsel is given great latitude in selecting their trial date. **Counsel should be aware that once this Scheduling Order is entered the trial date shall not be changed absent a showing of good cause based on exceptional circumstances. Failure to complete Discovery consistent with this Order shall not be a basis for continuance. Counsel should carefully read this Scheduling Order upon its receipt.**

1. The above cause is Specially Set for trial on (leave blank), 2012. This setting is considered a **NO CONTINUANCE** setting.
2. Plaintiff(s) shall designate all expert witnesses on or before _____, 20__.
3. Plaintiff(s) shall produce all expert witnesses for deposition on or before _____, 20__.
4. Defendant(s) shall designate all expert witnesses on or before _____, 20__.
5. Defendant(s) shall produce all expert witnesses for deposition on or before _____, 20__.
6. The deadline for filing motion to amend is _____, 20__.
7. The deadline for filing a motion to add parties _____, 20__.

8. All discovery will be completed on or before _____, 20__.
9. All dispositive motions, especially motions for summary judgment, will be filed on or before _____, 20__. 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
10. Any of the above time deadlines, except the trial date, pretrial conference and filing of dispositive motions, may be changed by agreement of the parties without notice to the Court, as long as such changes do not affect the trial date. Any desire to make changes without the agreement of the parties will require leave of Court. In the event the parties choose to deviate from the Scheduling Order, such agreements should be documented by the parties. Disputes over agreements to change time deadlines not documented will result in the strict enforcement of contents of the Scheduling Order.
11. Should circumstances arise that substantially alter the feasibility of the dates set forth in the scheduling order the parties should immediately contact the Court. 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.
12. The parties should contact the Court prior to filing any written pleadings regarding discovery disputes. After hearing the arguments of all parties, 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 times.

IT IS SO ORDERED.

Date

James F. Kanatzar
Circuit Judge – Division 5

A copy of the foregoing was hand delivered/mailed/faxed to:

Attorney for Plaintiff: _____
(Name) (Fax)

Attorney for Defendant: _____
(Name) (Fax)