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

**AT KANSAS CITY**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, )**

**Plaintiff(s), )**

**) Case No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**vs. ) Division 3**

**)**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, )**

**Defendant(s). )**

**PROPOSED SCHEDULING ORDER**

On the \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_, the above matter came before the Court for Case Management Conference. Plaintiff(s) appeared by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and Defendant(s) appeared by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Based on discussions had, the Court makes the following orders:

1. **TRIAL:** This matter is set for trial on \_\_\_\_\_\_\_\_\_\_\_\_\_, at 9:00 AM in Division 3. This Order is notice of the trial setting, which is a firm setting. Counsel estimates the trial will last \_\_\_\_\_ days and will require \_\_\_\_\_ venirepersons.
2. **CASE MANAGEMENT/PRE-TRIAL CONFERENCE:** This matter is set for a new case management conference on \_\_\_\_\_\_\_\_\_\_\_\_\_, at 1:30 PM in Division 3. Parties are instructed to review their case in Case.net, specifically “Scheduled Hearings & Trials,” for location and/or access information. The Court will discuss the necessity of a pre-trial conference at this Case Management Conference. Parties are strongly encouraged to review the “Pre-Trial Conference Order” available on the Division 3 website to prepare accordingly.
3. **JOINDER OF ADDITIONAL PARTIES:** All motions for joinder of additional parties shall be made no later than ninety (90) days from the date of this Order.
4. **DISCOVERY:** **All discovery must be completed by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.**
5. **MEDIATION:** The Court finds mediation of this case prior to an adversarial hearing before the Court is appropriate. Therefore, the parties are ordered to participate in mediation in this case by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. The parties shall agree on a mediator or may file a timely motion for the Court to appoint a mediator.
6. **EXPERT WITNESSES:** Plaintiff(s) shall designate retained and non-retained experts by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and shall make them available for deposition by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Defendant(s) shall designate retained and non-retained experts by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and shall make them available for deposition by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.
7. **DISPOSITIVE MOTIONS:** Dispositive motions shall be filed no later than four (4) months prior to the trial setting. No extensions will be granted for sur-reply filed less than 30 days prior to trial.
8. **OTHER ORDERS:**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. **SCHEDULING ORDER AMENDMENTS:** Any of the above deadlines, except for the trial date, **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 agreement of the parties will require leave of Court. In the event the parties agree to deviate from this Scheduling Order, such agreements shall be documented by the parties. Disputes over agreements to change time deadlines not documented will result in the strict enforcement of the contents of this Scheduling Order. The failure of the parties to follow the dates set forth in this Order without prompt notice to the Court that the Scheduling Order is amended by the parties, shall not serve as a basis for continuance and, in appropriate cases, may serve as a reason for the Court to consider sanctions.

**IT IS SO ORDERED.**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date HON. JERRI J. ZHANG

Judge, Division 3

CC: All counsel via e-Notification

All pro se parties via U.S. Mail