

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

)	
)	
Plaintiff(s),)	
)	Case No.
v.)	
)	Division 6
)	
)	
)	
Defendant(s).)	

[PROPOSED] SCHEDULING ORDER

On the _____ day of _____, 20____, the above matter came before the Court for Case Management Conference. Based on discussions had, the Court makes the following orders:

1. **TRIAL:** This matter is set for trial on _____, at 9:00AM in Division 6. No docket will be published. This order is notice of the trial setting, which is a firm setting.
2. **PRETRIAL CONFERENCE:** This matter is set for a pretrial conference on _____, at _____ AM/PM in Division 6.
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 shall designate retained and non-retained experts by _____, and shall make them available for deposition by _____. Defendants 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 trials setting. No extensions will be granted for sur-reply filed less than 30 days prior to trial.
8. **DEPOSITION DESIGNATIONS:** By 14 calendar days before the pretrial conference, parties shall serve and file designations by page and line of deposition testimony that the offering party intends to read at trial. By 10 calendar days before the pretrial conference, each party shall serve and file any objections to the other party's disposition designations and shall provide any counter designations of testimony proposed to be read with the other party's designations. No more than

3 calendar days before the pretrial conference, the parties shall serve and file with the Court any objections to the other party's counter designations.

9. **MOTIONS IN LIMINE** shall be filed no more than 3 calendar days before the pretrial conference
10. **PROPOSED VERDICT DIRECTORS** shall be filed with the Court prior to the pre-trial conference.
11. **WITNESS AND EXHIBIT LISTS** shall be filed the Wednesday before trial.
12. **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.
13. **OTHER ORDERS:**

IT IS SO ORDERED.

DATE

MICHELLE L. COCAYNE, Circuit Judge

Certificate of Service

This is to certify that the foregoing was automatically forwarded to the attorneys of record through the Court's eFiling system at the date stated above.

Law Clerk

APPROVED BY COUNSEL AS TO DATES & CONTENT:
