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

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Plaintiff(s), )

) Case No.

vs. ) Division 4

)

)

)

Defendant(s). )

**SCHEDULING ORDER[[1]](#footnote-1)**

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

NOW on this day of , 2025, 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 a.m. / p.m. in Division 4 of the Jackson County Circuit Court. Counsel estimates the trial will last \_\_\_\_ days and will require \_\_\_\_\_\_venirepersons. This trial date is considered final, therefore **no continuances will be granted absent extraordinary circumstances.**
2. This matter is set for a new case management conference on Monday, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ at 9 a.m. in Division 4. The Court will discuss the necessity of a pre-trial conference at this Case Management Conference.
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.

1. Plaintiff(s) shall designate all expert witnesses on or before .
2. Plaintiff(s) shall produce all expert witnesses for deposition on or before

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1. Defendant(s) shall designate all expert witnesses on or before .
2. Defendant(s) shall produce all expert witnesses for deposition on or before

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1. The deadline for filing motion(s) to amend is .
2. The deadline for filing motion(s) to add parties is .
3. All discovery will be completed on or before .
4. All dispositive motions, especially motions for summary judgment, must be filed **no less** than **one hundred twenty (120) days** prior to the trial date. Any dispositive motions less **than one hundred twenty (120)** days prior to trial 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.
5. Any of the above time deadlines, except the trial date, pretrial conference, filing of dispositive motions, and mediation deadline, 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 that the parties choose to deviate from the Scheduling Order, such agreement should 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.
6. All Motions in Limine or other pretrial motions must be filed **two (2) weeks** before the trial date. This deadline for Motions in Limine may not be changed without approval of the Court.
7. Parties shall file any designated portion of depositions to be read, shown or played to the jury by videotape **thirty (30) days before trial**. Objections to proposed deposition designations shall be filed **twenty (20) days before trial**. Counter-designations are due **ten (10) days before trial**, and objections to counter-designations are due **seven (7) days before trial**.
8. 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.
9. All proposed jury instructions (with MAI citations) must be emailed to the Division Law Clerk **two (2) weeks** before the trial date. This deadline for proposed jury instructions may not be changed without approval of the Court.

# IT IS SO ORDERED.

Date HON. PATRICK C. EDWARDS

Judge, Division 4

# Certificate of Mailing

This is to certify that a notice of the entry of the foregoing was automatically forwarded to the attorneys of record through the Court's eFiling system.

Law Clerk

1. When completed by the parties please email in Word forms to [div4chambers@courts.mo.gov](mailto:div4chambers@courts.mo.gov) and the JAA and law clerk for Division 4. [↑](#footnote-ref-1)