

Cause No: _____ -D3

_____	§	IN THE DISTRICT COURT
V.	§	341 ST DISTRICT COURT
_____	§	WEBB COUNTY, TEXAS

COMPLEX CASE DOCKET CONTROL & SCHEDULING ORDER (LR 3.33)

1. New Parties shall be joined and served by this date. _____

2. Deadline for written discovery to opposing party(ies) (Requests for Disclosure, Interrogatories, Requests for Production and Requests for Admission). _____

3. Deadline to produce all documents requested by the parties. _____

4. Lay –witness depositions: _____

Noticed by Plaintiffs _____

Noticed by Defendants/Third Party Plaintiffs _____

Notice by Third Party Defendants _____

5. Experts by Party(ies) Seeking Affirmative Relief: _____

Deadline to designate _____

Deadline for submission of reports _____

Deadline to depose experts of party(ies) seeking affirmative relief _____

6. Experts by Responding Party(ies): _____

Deadline to designate _____

Deadline for submission of reports _____

Deadline to depose experts of responding party(ies) _____

7. Deadline to file Daubert/Robinson motions. _____

8. Production of proposed computerized summaries and samples:

Plaintiff(s) Deadline

Defendant(s) Deadline

Third Party Defendant(s) Deadline

9. Deadline for designating factual witnesses.

10. Deadline to file all dispositive motions.

11. Except for good cause shown:

Relief from this schedule shall not be granted and all discovery shall be completed by:

Discovery shall be limited to matters occurring after _____ and before _____.

No more than Enter # interrogatories (including subparts) may be propounded to any party (exclusive of interrogatories seeking identity of people with particular knowledge and documents).

No more than Enter # hours of deposition of lay witnesses may be taken by each side, and no single deposition may take more than Enter # hours.

No more than Enter # hours of deposition of expert witnesses may be taken by each side, and no single deposition may take more than Enter # hours.

12. AMENDED PLEADINGS: Party(ies) seeking affirmative relief will file by this date. Responding party(ies) will be filed within ten (10) days of this date.

13. Plaintiff's deadline to designate video deposition testimony for use at trial.

14. Defendants' and Third Party Defendants' deadline to designate video deposition testimony for use at trial.

15. Plaintiff's deadline to submit exhibit list to opposing counsel.

16. Defendants' and Third Party Defendants' deadline submit exhibit list to opposing counsel.

17. ALL TRIAL MOTIONS, OBJECTIONS TO THE OTHER PARTY'S DESIGNATION OF VIDEO TESTIMONY AND TO EXHIBITS, MOTIONS IN LIMINE AND PROPOSED JURY QUESTIONS AND INSTRUCTIONS SHALL BE FILED. FAILURE TO FILE by this date will cause a show cause order to be issued for contempt and/or for the imposition or any other sanctions against trial counsel and/or the parties.

18. ALTERNATE DISPUTE RESOLUTION. The parties or their duly authorized representatives and, in any case involving insurance, a representative or the insurance carrier, who is authorized to settle the case, are all ordered to attend the mediation or arbitration session. Failure to do so will result in imposition of sanctions. Attorneys and the mediator are ordered to bring to the attention of the court any failure of any party or attorney to comply with this order.

19. PRE-TRIAL CONFERENCE will be held at Enter date and time a.m./p.m. All trial motions, including motion in limine and objections to deposition testimony and to exhibits, will be heard at the pre-trial conference.

20. Jury Trial will start at Enter date and time .

The parties that this Complex Case Docket Control and Scheduling Order shall constitute a binding agreement between the parties as defined by Rule 11 of the Texas Rules of Civil Procedure and shall serve as a modification of the discovery procedure as provided for in Rule 191.1 of the Texas Rules of Civil Procedure. Leave of court is required for any modification to this order.

All responses to motions, supporting briefs and/or copies of case law counsel are on are to be filed three (3) days before the date of any hearing.

Signed this ____ day of _____, 20____.

Elma Teresa Salinas Ender, Judge Presiding

Counsel for Plaintiff(s) or Pro Se Plaintiff

Counsel for Defendant(s) or Pro Se Defendant

Print

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Address

Address

Phone

Phone

Email

Email

Client(s)

Client(s)