

“EXHIBIT A”

(Complex Case Management Plan)

1. Deadline for Service of Complaint:	Within 120 days after the Complaint is filed pursuant to Florida Rule of Civil Procedure 1.070(j).
2. Service under Extension:	The time for service shall be extended by the Court provided that Plaintiff shows good cause or excusable neglect for the failure to effect service within 120 days.
3. Service when Adding New Parties:	The 120-day period shall begin upon the entry of the order granting leave to amend complaints to add a new party or parties.
4. If no answer filed and Plaintiff has not filed a Motion for Default 30 days after date of service	Case Manager to set Status Conference.
5. Date of First Response: (e.g. Answer, Notice of Appearance, Motion for Extension of Time, Motion to Dismiss)	The date of first filing by the Defendant(s).
6. Deadline for Propounding Requests for Production, Requests to Admit and Interrogatories:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
7. Deadline for Initial Scheduling and Setting Depositions:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
8. Case Management Conference Date/Time:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
9. Deadline for Witness and Exhibit List:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
10. Deadline for Expert Disclosure: (Parties should furnish opposing counsel with the names and addresses of all expert witnesses under Rule 1.390(a) to be called at trial and all information regarding expert testimony that is required by Rule 1.280(b)(5). Each party is limited to one expert per specialty. No other expert testimony should be permitted at trial. Information furnished pursuant to this paragraph should be timely filed with the Clerk of Courts.)	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
11. Deadline for Inspections/Examinations:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
12. Deadline for Discovery Completion (Including Depositions):	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>

13. Deadline for Dispositive Motions:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
14. Deadline for Jury Instructions:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
15. Deadline for ADR/Mediation:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
16. Pre-trial Conference:	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>
17. Notice of Trial date ____ week period: (Trial notice must be sent at least 35 days prior to trial.)	Set according to <i>Stipulated Agreement as to Deadlines and Events for Complex Civil Cases</i> or <i>Order Setting Deadlines and Events for Complex Civil Cases</i>

Form Order 2-5 "Exhibit A"