

**“EXHIBIT A”**

(Foreclosure Case Management Plan)

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| 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 Case 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:                     | Within 15 days out from the first response date.   |
| 7. Deadline for filing, setting and resolving motions directed at pleadings:                                    | Within 30 days out from the first response date.   |
| 8. Deadline for Witness and Exhibit List:   | At least 30 days prior to trial.   |
| 9. Deadline for Motion for Summary Judgment or other Dispositive Motions:                                       | At least 40 days prior to trial.   |
| 10. Deadline for nonmovant’s response to Motion for Summary Judgment with its supporting factual position:      | At least 20 days prior to trial.   |
| 11. Deadline for Discovery Completion (Including Depositions):  | At least 30 days prior to trial.   |
| 12. Notice of Trial date ____ week period: (Trial notice must be sent at least 35 days prior to trial.)         | Must include length of trial period and date trial is set to commence. Case Manager to issue Trial Order as soon as case is at issue.                                |