

“EXHIBIT A”

(General 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:	Within 120 days out from the first response date.
7. Deadline for Initial Scheduling and Setting Depositions:	Within 150 days out from the first response date.
8. Case Management Conference Date/Time:	If Case Management Conference is requested or required, Case Manager will prepare “Order Setting Case for Case Management Conference” at least two weeks prior to date set.
9. Deadline for Witness and Exhibit List:	Within 190 days out from the first response date.
10. Deadline for Expert Disclosure: <i>(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.)</i>	Within 190 days out from the first response date.
11. Deadline for Inspections/Examinations:	Within 190 days out from the first response date.
12. Deadline for Discovery Completion (Including Depositions):	Within 210 days out from the first response date.
13. Deadline for Dispositive Motions:	Within 210 days out from the first response date.
14. Deadline for Jury Instructions:	Within 210 days out from the first response date.
15. Deadline for ADR/Mediation:	Within 210 days out from the first response date.
16. Pre-trial Conference:	Within 210 days out from the first response date. Calendar Call will be held at this time.
17. 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.