

JAMES J. DONELON

NO. 651,069 SEC. 22

V.

JUDGE TIMOTHY KELLEY

TERRY S. SHILLING, ET AL

COURT 10D

**CASE MANAGEMENT SCHEDULE**

**BY ORDER OF THIS COURT**, the following Case Management Schedule shall control this case. No variance of this Order shall be allowed without written approval of this Court:

1. Parties shall work together to exchange, search, and manage all ESI data. To the extent they have not already done so, the parties shall serve written responses and objections to any outstanding written discovery requests on or before September 30, 2020, and substantially complete production of responsive, non-privileged documents to such requests on or before March 1, 2021.
2. Parties shall reciprocally exchange preliminary witness lists on or before March 15, 2021.
3. Joinder of parties and amendment of pleadings must be completed on or before April 1, 2021.
4. Parties shall supplement their fact witness list on or before May 14, 2021.
5. Final fact discovery cutoff is set for December 1, 2021. All discovery motions and motions for protective orders pertaining to fact discovery must be filed no later than 30 days after this date.
6. The parties have agreed to set aside the following dates for depositions:

April 2021: 27, 30	August 2021: 3, 4, 5
May 2021: 25, 26, 27	September 2021: 1, 2
June 2021: 22, 23, 24, 29, 30	October 2021: 12, 13, 14, 26, 27, 28
July 2021: 27, 28, 29	November 2021: 2, 3, 4, 16, 17, 18

Absent prior consent and agreement of all parties, depositions shall not be scheduled on any date not listed herein.

The parties have agreed to take depositions either in-person and/or via Zoom, depending upon the circumstances surrounding the subject deposition, and pursuant to a mutually agreeable protocol.

7. Expert witness testimony is required:
  - a. Plaintiff shall disclose to defendant(s) the names of all testifying experts and the subject matter of their testimony on or before November 15, 2021. All Plaintiff's expert reports shall be produced to defendant(s) on or before December 15, 2021.
  - b. Defendant shall disclose to plaintiff the names of all testifying experts and the subject matter of their testimony on or before January 14, 2022. All Defendant(s) expert reports shall be produced to plaintiff on or before February 15, 2022.
8. All expert discovery, including depositions of all experts, shall be completed on or before April 15, 2022. All discovery motions and motions for protective orders pertaining to expert discovery shall be filed no later than 30 days after this date.
9. Parties shall exchange pretrial inserts on or before May 16, 2022.
10. Parties shall file all pre-trial motions (with the exception of non-Daubert, evidentiary,

motions in limine), including any dispositive motion or exception, any Daubert motion or other motion challenging the admissibility of any expert testimony (in whole or in part), and/or any discovery motion, on or before May 31, 2022.

11. The pretrial order shall be prepared, signed by all parties, and filed by plaintiff counsel with the court on June 29, 2022.

12. It is the intent and desire of the parties, subject to the discretion and Order of this Court, that the trial of this matter shall be set in the fall of 2022 or early 2023.

The foregoing Case Management Schedule is adopted as an Order of this Court this \_\_\_\_ day of \_\_\_\_\_, 2020.

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Judge Timothy E. Kelley

**RULE 9.5(b) CERTIFICATE**

I certify that, after numerous weeks of negotiations and after all counsel agreed to the same, I circulated this proposed CASE MANAGEMENT SCHEDULE to counsel for all parties by email on September 1, 2020, and that all counsel agreed to the form of this proposed CASE MANAGEMENT SCHEDULE prior to filing.

Certified this 9<sup>th</sup> day of September, 2020.



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J. E. Cullens, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing has been furnished via e-mail to all counsel of record as follows, this 9<sup>th</sup> day of September, 2020, in Baton Rouge, Louisiana.

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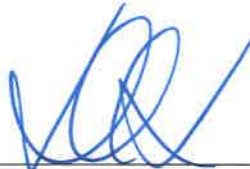
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