

**EXHIBIT A**

**PROPOSED SCHEDULE OF PRETRIAL AND TRIAL DATES**

Matter <sup>1</sup>	Weeks Before Trial	Plaintiff(s) Request	Defendant(s) Request	Court Order
Deadline to file Motion to Join Parties	Approx. 30 days after entry of the Case Management and Scheduling Order absent good cause			
Deadline to Serve All Parties (including DOE or ROE Defendants)	Approx. 30 days after entry of the Case Management and Scheduling Order absent good cause			
Deadline to file Motion to Amend Pleadings	40			
Fact Discovery Cut-Off (including filing of related motions)	21			
Expert Disclosures	19			
Rebuttal Expert Disclosures	16			
Expert Discovery Cut-Off (including filing of related motions)	14			
Substantive Motions 10:00 a.m. (Weds.)	13			
Last Day to Conduct Settlement Proceedings	12	L.R. 16–14 Settlement Choice: <input type="checkbox"/> No. 1 USMJ <input type="checkbox"/> No. 2 Court Mediation Panel <input type="checkbox"/> No. 3 Private ADR Date: _____	L.R. 16–14 Settlement Choice: <input type="checkbox"/> No. 1 USMJ <input type="checkbox"/> No. 2 Court Mediation Panel <input type="checkbox"/> No. 3 Private ADR Date: _____	L.R. 16–14 Settlement Choice: <input type="checkbox"/> No. 1 USMJ <input type="checkbox"/> No. 2 Court Mediation Panel <input type="checkbox"/> No. 3 Private ADR Date: _____
Last Day to File Motions in Limine and Daubert Motions	8			
Final Pretrial Conference 2:00 p.m. (Weds.)	2			
Trial Date 9:00 a.m. (Tues.)		<input type="checkbox"/> Jury <input type="checkbox"/> Bench Est. length: Date: _____	<input type="checkbox"/> Jury <input type="checkbox"/> Bench Est. length: Date: _____	<input type="checkbox"/> Jury <input type="checkbox"/> Bench Est. length: Date: _____

<sup>1</sup> The parties should seek additional deadlines relevant to the specific case type at issue by including them in their Joint 26(f) Report. For example, class action, ERISA, and patent cases may need to vary from the above.

