
“Paper” Discovery Deadline. All outgoing “paper” discovery, including interrogatories, requests for production, requests for admission, requests for disclosure, etc., must be served upon opposing counsel on or before the date specified.

Deposition Deadline. All depositions must be concluded by the date specified.

Designation of Responsible Third Parties. Responsible third parties must be designated on or before the date specified.

Deadline for Adding or Joining New Parties. New parties must be added or joined on or before the date specified.

Amended Pleadings. Amended pleadings must be filed on or before the date specified.

Summary Judgment Motions. Summary Judgment Motions must be filed on or before the date specified. This agreed deadline must be a date which is at least 45-days before the Final Pretrial, so the Coordinator has adequate time under the Texas Rules of Civil Procedure to schedule the summary judgment hearing.

Plaintiff’s Expert Witness Designation Date. (See below)

Defendant’s Expert Witness Designation Date. (See below)

Each Plaintiff must comply with the following on or before *Plaintiff’s Expert Witness Designation Date*. Each Defendant must comply with the following on or before *Defendant’s Expert Witness Designation Date*:

As to all of Plaintiff’s and Defendant’s testifying experts – serve upon the attorneys of record:

1. the expert’s name, address, and telephone number;
2. the subject matter on which the expert will testify; (3) the general substance of the expert’s mental impressions and opinions, and a brief summary of the basis for them (or if the expert is not retained by, employed by, or otherwise subject to Plaintiff’s/Defendant’s control – documents reflecting such information).

Additionally, as to all of Plaintiff’s/Defendant’s testifying experts who are retained by, employed by, or otherwise subject to the control of Plaintiff/Defendant – serve upon the attorneys of record:

1. all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
2. the expert's current resume or curriculum vitae.

_____ **Mediation Deadline.** IT IS ORDERED that mediation shall occur on or before the specified date using the following agreed upon Mediator: _____.

NOTE: It is unacceptable to specify *TBD* or *To Be Determined* – a Mediator's name must be included in the blank space.

A reasonable mediation fee shall be allocated among the parties as determined to be fair by the Mediator, and each party to the lawsuit shall have an individual with full settlement authority personally present for mediation.

_____ **Other Agreed Upon Deadline.** Insert in the blank "N/A" if not applicable; otherwise, describe as follows: _____

_____ **Maximum Number of Days for Jury Trial.** Excluding Jury Selection – indicate the maximum number of days for Trial, beginning with opening statements and concluding with a verdict.

Signed on _____.

 Judge Presiding

Approved by Counsel (Name, Signature, and Email Address of each Attorney):
