**United States District Court**

**Middle District of Florida**

Choose division

Enter name(s),

Plaintiffs,

v. Case No. Enter case number

Enter name(s),

Defendants.

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

# Proposed IDEAL Program Case Management Report

To facilitate the goals of the IDEAL Program:

The parties accept the schedule set forth in the order referring this case to the IDEAL program and propose the following trial date: **DATE**.

The parties jointly propose the below schedule.

**I. Pre-Discovery Deadlines**

**A. Certificate of Interested Parties and Corporate Disclosure Statement:**

**Completed**/Due by: **DATE**.

**B. Deadline to Answer or Otherwise Respond to the Complaint:**

**Completed**/Due by: **DATE**.

**C. Early Mediation Deadline**

Consistent with the IDEAL Program, the parties do not request mediation.

While Local Rules 4.01, 4.02, and 4.03, which govern mediation proceedings, normally do not apply to IDEAL Program cases, the parties propose the appointment of the following mediator **NAME/ADDRESS**, with mediation to be conducted (virtually or in person) on or before **DATE** in accordance with the procedures outlined in Chapter Four of the Local Rules.

**II. Discovery Deadlines**

**A. Phase I—Written Discovery: DATE PERIOD** [generally 2 months]

**1. Initial Disclosures**

The parties agree to disclose the mandatory Initial Disclosures required by Fed. R. Civ. P. 26(a)(1)(A) on or before **Completed**/**DATE** [generally **7 days** from filing this CMSO].

**2. Requests for Production, Interrogatories, and Requests for Admission**

On or before **DATE** [generally **14 days** from filing this CMR], the parties agree to serve no more than **10** [generally 10] requests for production (including requests in the form of subpoenas to non-parties), **5** [generally 5] interrogatories, and **5** [generally 5] requests for admission. Search protocols for email shall be limited to **5** [generally 5] custodians and **five** [generally 5] search terms. Responses to the written discovery are due within **30 days** [generally 30] of service, unless a party files a Notice of Objection.

**B. Phase II— Fact Depositions Discovery: DATE PERIOD** [generally one to two month period]

Fact depositions are limited to **NUMBER** [generally 18] hours per side.

**C. Phase III—Supplemental and Expert Discovery: DATE PERIOD** [generally one to two month period]

**1. Supplemental Discovery**

At the conclusion of Phase II discovery, any party may file a two-page notice identifying with specificity any supplemental discovery the party wishes to take. The Court will authorize supplemental discovery only upon a showing of substantial justification.

**2. Expert Discovery**

Absent leave of Court, no party shall disclose more than **2** [generally 2] expert witnesses to testify. Expert depositions shall be limited to **8** [generally 8] hours per side. The parties may agree to submit expert reports in lieu of testimony.

**III. Pre-Trial Motions**

**A. Non-Dispositive Motions**

The parties request a non-dispositive motions deadline of **DATE** and agree that any such motions will be limited to **5** pages.

**Consistent with the IDEAL program**, the parties agree that if a party desires to file a non-dispositive motion concerning any pre-trial matter, including motions to seal and motions for extensions or modifications of the schedule, the party shall first file a notice, not to exceed 2 pages, identifying the issues to be addressed by the proposed motion. Upon consideration, the Court will either grant leave to file the motion or set the matter for a hearing.

**B. Motions for Summary Judgment**

The parties request a summary judgment deadline of **DATE** and agree that any such motions will be limited to **10** pages.

**Consistent with the IDEAL program**, the parties agree that if a party desires to file a dispositive motion, it shall first file a notice on or before **DATE**, not to exceed 2 pages, identifying the issues to be addressed by the proposed motion for summary judgment. The Court will then establish an expedited briefing schedule, set page limits, and reset the trial date as appropriate. Reasonable attorney’s fees and costs shall be awarded to the prevailing party on the motion for summary judgment as permitted by law.

**C. *Daubert* Motions or Motions In Limine**

The parties request a *Daubert* motion and motion in limine deadline of **DATE** and agree that any such motions will be limited to **10** pages.

**Consistent with the IDEAL program**, the parties agree that if a party desires to file a *Daubert* motion or motion in limine, the party shall first file a notice on or before **DATE**, not to exceed 2 pages, identifying the issues to be addressed by the proposed motion. Upon consideration, the Court will either grant leave to file the motion or set the matter for a hearing.

**IV. Trial**

The parties request a **jury/bench** trial be scheduled to commence on **DATE**. The parties agree that each side shall be granted **NUMBER** [generally 12] hours of trial time for opening statements, direct examinations of its witnesses, cross examinations of other witnesses, and final argument. [Notably, if appropriate, the Court may increase the amount of trial time available per side.]

**V. Signatures**

Add name of party or counsel Add name of party or counsel

If counsel, add name of client If counsel, add name of client

Add date of signature Add date of signature

Add name of party or counsel Add name of party or counsel

If counsel, add name of client If counsel, add name of client

Add date of signature Add date of signature

Add name of party or counsel Add name of party or counsel

If counsel, add name of client If counsel, add name of client

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