IN THE CIRCUIT COURT OF

 THE FOURTH JUDICIAL CIRCUIT, IN

 AND FOR DUVAL COUNTY, FLORIDA

 CASE NO.:

DIVISION:

Plaintiff(s)

v.

Defendant(s).

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/

**CASE MANAGEMENT PLAN**

**(General Track[[1]](#footnote-1))**

The parties submit the following Case Management Plan to the Court for approval in all cases filed before April 30, 2021. ***Note: All dates are to be calculated from the date of the Order Approving Case Management Plan, unless otherwise noted.***

|  |  |
| --- | --- |
| **DEADLINE OR EVENT** | **AGREED DATE** |
| **Deadline for Service of Process** | 120 days |
| **Deadline for Service of Process extended if not accomplished within 120 days** | 150 days or all unserved defendants are dismissed without prejudice. |
| **Deadline for Leave to Add Parties and Amend Pleadings** | Motions must be set for hearing and heard within \_\_\_\_ days from the earlier of the date of the order approving this Case Management Plan or service on the last defendant, or the Motions are deemed abandoned and denied. |
| **Motions to Dismiss, Motion for More Definite Statement, Motions to Strike and any objections to the pleadings** | Motions must be set for hearing and heard within \_\_\_\_\_ days from the filing of the motion/objection or, if previously filed, within \_\_\_\_\_\_ days from the date of the order approving this Case Management Plan, or deemed abandoned and denied. Non-movant shall timely submit a proposed order if the motion/objection is deemed abandoned and denied. |
| **Deadline for Completion of Fact and Expert Discovery** | Must be completed \_\_\_\_\_ days from the date of approval of this Case Management Plan. Additional disclosure and discovery deadlines will be established by the Uniform Order Setting Pre-Trial and Trial in the case. |
| **Pre-trial Motions, including Dispositive and Daubert Motions** | Must be filed no later than \_\_\_\_ days after completing discovery and heard no later than seven (7) days prior to the pre-trial conference, or are deemed abandoned and denied. |
| **Mediation/Alternative Dispute Resolution** | Within 30 days from the date of approval of this Case Management Plan or after the depositions of all parties are complete, whichever is later, counsel shall meet and confer regarding whether an early mediation would be productive to resolve certain issues or the entire case. A final mediation shall occur no later than thirty (30) days after all discovery is completed. |
| **Approximate Pre-Trial Conference** | Approximately 3-4 weeks prior to the trial date. |
| **Approximate Trial Date** | 18 months from the date of the order approving this Case Management Plan. |

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Signature of Counsel and Unrepresented Parties. Counsel must state FL Bar number. Unrepresented parties must include email address for service.**

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1. This Case Management Plan applies to all cases not designated as complex or streamlined under Fourth Circuit Administrative Order No. 2021-21 to be resolved within 18 months per Florida Rule of General Practice and Judicial Administration 2.250. [↑](#footnote-ref-1)