

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

,)
)
Plaintiff[s],) Civil Action No.
)
v.)
) Chief United States Magistrate Judge
,) Cynthia Reed Eddy
)
Defendant[s].)
)
)

[JOINT PROPOSED] CASE MANAGEMENT ORDER

AND NOW this ____ day of _____, 202_, IT IS HEREBY ORDERED that this action is placed under Local Rule 16.1 for pretrial proceedings and all provisions of the Rule will be strictly enforced. Pursuant to Local Rule 16.1, the parties are directed as follows:

1. The parties shall move to amend the pleadings or add new parties by _____. (*no later than 60 days before the close of discovery*).
2. The parties shall complete fact discovery by _____. (*no later than 150 days from Initial Case Management Conference if parties have chosen mediation or early neutral evaluation, 120 days if they have chosen arbitration*) All interrogatories, depositions and requests for admissions and/or production of documents shall be served within sufficient time to allow responses to be completed prior to the close of fact discovery.
3. **[Choose One]** The parties do not contemplate using experts in this case.

[OR]

Plaintiff's Expert Reports are due on or before _____. (*no later than 120 days after initial case management conference*)

Defendant's Expert Reports are due on or before _____. (*no later than 140*

days after initial case management conference)

Depositions of all experts shall be on or before _____. *(no later than 150 days after initial case management conference)*

4. The parties shall complete the ADR process they selected by _____. *(no later than 60 days from Initial Case Management Conference if the parties have chosen mediation or early neutral evaluation, 90 days if they have chosen arbitration)*. Discovery is **NOT** stayed pending ADR.
5. The Court will hold a mid-discovery telephone status conference on _____. *(leave blank – to be set at initial case management conference)*
6. If a discovery dispute occurs, prior to filing any discovery motions, the parties shall first meet and confer in an attempt to resolve the dispute. If the matter is still unresolved after meeting and conferring, then the parties shall jointly contact Chambers for purposes of scheduling a telephone conference with the Court.
7. The parties have elected to have the Court separately enter the Model Order located in the Appendix to LCvR 16.1.D relating to the protections of Federal Rule of Evidence 502(d).
8. The Court will conduct a post-discovery status conference on _____ at _____ AM/PM *(leave blank – to be set at initial case management conference)* in the Chambers of United States Magistrate Judge Cynthia Reed Eddy, Suite 10160 U.S. Post Office and Courthouse, 700 Grant Street, Pittsburgh, Pennsylvania. Lead trial counsel shall attend, and the court will inform counsel if attendance by the parties is necessary. Counsel must fax to 412-208-7583, or e-mail to Courtroom Deputy Katie Curtis at Catherine_curtis@pawd.uscourts.gov, updated confidential position letters on or before _____ *(leave blank – will be approximately three business days prior to)*.

IT IS FURTHER ORDERED that counsel shall confer with their clients prior to

all case management, status or pretrial conferences to obtain authority to participate in settlement negotiations to be conducted by the Court. Counsel are encouraged to instruct the principals to be available by telephone to facilitate the amicable resolution of all litigation.

By the Court:

Cynthia Reed Eddy
Chief United States Magistrate Judge

cc: all counsel of record