

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

ANDREA ROSSI, et al)	
)	
Plaintiffs,)	
)	
v.)	Civil Case Number: 1:16-CV-21199-CMA
)	
THOMAS DARDEN, et al)	
)	
Defendants.)	
	/	

JOINT PROPOSED SCHEDULING ORDER

THIS CAUSE is set for trial during the two-week trial period that begins on **September 18, 2017**. Calendar call will be held at _____ a.m./p.m. on **September _____, 2017**. No pretrial conference will be held unless a party requests one no later than 30 days before the calendar call and the Court determines that one is necessary.

A. Case Management Track.

Due to the complex nature of the above styled case and upon the joint position of counsel that additional time for discovery is needed due to the number of potential deponents, the complexity of certain issues, and the potential for depositions in foreign countries, this matter is assigned to the Complex case management track pursuant to Local Rule 16.1(a)(2)(C).

B. Discovery Schedule Agreed to by the Parties.

The parties shall comply with the deadlines set forth below:

DATE: (Days before trial)	Pretrial Deadline:
The earlier of (a) 14 days after the date the Court denies a motion to dismiss as to at least one claim or (b) August 15, 2016 (399)	Start of fact discovery period. Parties to provide initial disclosures pursuant to Rule 26(a)(1)(A).

September 12, 2016 (371)	Deadline for joinder of additional parties, motion to amend complaint by Plaintiffs, and motion to amend counterclaims by Defendants, if counterclaims are pending.
December 30, 2016 (262)	Parties shall select a mediator, schedule a time, date and place for mediation, and shall file a proposed order scheduling mediation.
February 17, 2017 (213)	Fact discovery must be completed.
March 3, 2017 (199)	Parties shall exchange expert witness summaries and reports as required by Local Rule 16.1(K).
March 17, 2017 (185)	Mediation must be completed.
April 28, 2017 (143)	Parties shall exchange rebuttal expert witness summaries and reports as required by Local Rule 16.1(K).
May 31, 2017 (110)	Expert discovery must be completed.
June 19, 2017 (91)	All summary judgment and <i>Daubert</i> motions must be filed.
July 31, 2017 (49)	All pretrial motions (including motions in <i>limine</i>), other than summary judgment and <i>Daubert</i> motions, must be filed. Joint Pretrial Stipulations must be filed.
August 7, 2017 (42)	Deposition designations must be served.
August 14, 2017 (35)	Deposition cross-designations must be served.
August 21, 2017 (28)	Rule of completeness designations must be served.
September 5, 2017 (13)	Proposed jury instructions and/or proposed findings of fact and conclusions of law must be filed.
September 18, 2017	Beginning of Trial Period.

C. Referral to Magistrate Judge.

Pursuant to 28 U.S.C. § 636 and this District's Magistrate Judge Rules, all discovery motions are referred to the Magistrate Judge.

D. Need for Rule Variations.

The parties have agreed to extend the maximum deposition duration, imposed by Fed. R. Civ. P. 30(d)(1), from seven (7) hours to twelve (12) hours without leave of the Court for all witnesses who require an interpreter.

Furthermore, the parties have agreed that it may be necessary to exceed the maximum limitation on the number of depositions which may be taken without leave of the Court pursuant to Fed. R. Civ. P. 30(a)(2)(A). Accordingly, the parties have agreed that each party may take up to thirteen (13) oral/videographic depositions of fact witnesses without leave of Court.

DONE AND ORDERED in Chambers at Miami, Florida, this __ day of _____, 2016.

CECILIA M. ALTONAGA
UNITED STATES DISTRICT JUDGE

cc: Magistrate Judge John J. O'Sullivan
Counsel of Record