

2. Discovery

The following time limits and deadlines shall be applicable:

- A. Any amendments to pleadings or actions to join other parties shall be filed on or before _____. (It is recommended that any joinder or amendments be made early in the discovery process so as to avoid the need to prolong discovery as to new parties or new issues.)
- B. All written discovery shall be propounded no later than 45 days before the close of fact discovery, unless the requesting party has obtained prior leave of court.
- C. The cutoff of fact discovery is _____.
- D. Any party with the burden of proof shall disclose its expert testimony pursuant to Rule 26(a)(2) on or before _____.
- E. The parties may depose the other side's expert disclosed pursuant to Rule 26(a)(2) at any time prior to _____.
- F. The parties shall disclose any rebuttal expert at any time prior to _____.
- G. The parties shall have until _____ to depose the opposing party's rebuttal expert.

3. Prospects of Settlement

- A. Counsel are to discuss settlement at the scheduling conference and to report on the status of settlement discussions.
- B. The parties are to report on the earliest date on which they would be prepared to attend a settlement conference (with clients) with the Court and what discovery, if any, they believe may be needed to meaningfully assess settlement.

[Sections 4 through 6 to be filled out only if the parties have consented to have the case tried before Judge Valdez]

4. Motions

- A. Any dispositive motions to be filed on or before _____. (Ordinarily this date will be 30 days following the close of fact discovery.)
- B. Any *Daubert* motions to be filed on or before _____. (Ordinarily this date will be 30 days following the close of expert discovery.)

5. Final Pretrial Order and Conference

A. The final pretrial order shall be filed on or before _____.

B. The final pretrial conference will be held on _____ at _____ .m.

6. Trial

The case will be ready for trial by _____ and is expected to take _____ trial days.

ENTERED:

Dated: _____

HON. MARIA VALDEZ
United States Magistrate Judge