

EXHIBIT A**Pretrial Deadlines, Pretrial Conference and Trial Date**

- October 8, 2010 Joinder of parties and amendment of pleadings.
- December 3, 2010 Parties shall furnish opposing counsel with a written list containing the names and addresses of all fact witnesses intended to be called at trial and only those witnesses listed shall be permitted to testify unless good cause is shown and there is no prejudice to opposing party. The parties are under a continuing obligation to supplement discovery responses within ten (10) days of receipt or other notice of new or revised information.
- January 3, 2011 All fact discovery must be completed.
- January 21, 2011 Plaintiff must furnish expert witness list to the Defendant, along with the summaries/reports required by Local Rule 16.1.K, and only those expert witnesses shall be permitted to testify. Within the fourteen day period thereafter, Plaintiff shall make its experts available for deposition by Defendant.
- January 7, 2011 All dispositive and other pretrial motions not explicitly excluded by S.D. Fla. L.R. 7.1.A.1 (other than Motions in Limine) and accompanying memoranda of law must be filed. A **minimum of seventeen (17) weeks** is required for the Court to review dispositive motions prior to filing of the joint pretrial stipulation.
- February 4, 2011 Defendant must furnish expert witness list to the Plaintiff along with the summaries/reports required by Local Rule 16.1.K, and only those expert witnesses shall be permitted to testify. Within the fourteen day period thereafter, Defendant shall make its experts available for deposition by Plaintiff.
- February 18, 2011 All expert discovery must be completed.
- March 4, 2011 Mediation must be completed. (The parties should select the earliest date to maximize resolution of the case in a manner that promotes client and judicial economy.)
- May 6, 2011 Joint pretrial stipulation must be filed pursuant to Local Rule 16.1.E. The pretrial stipulation shall include Plaintiff's non-binding breakdown of damages with corresponding amounts; the witness lists shall be pared down to those witnesses the parties actually intend to call at trial; and the exhibit lists shall identify the witness introducing each exhibit. **The parties shall meet at least one (1) month prior to the deadline for filing the pretrial stipulation to confer on the preparation of that**

stipulation. The Court will not accept unilateral pretrial stipulations, and will strike, *sua sponte*, any such submissions.

May 6, 2011 Joint Summary of Respective Motions in Limine must be filed. The Summary shall contain a cover page providing the style of the case and an index of the motions in limine. The Summary shall also include for each evidentiary issue: (i) a one (1) page motion identifying the evidence sought to be precluded at trial and citing legal authority supporting exclusion; and (ii) a one (1) page response to the motion providing a statement of the purpose for which the challenged evidence would be offered and citing legal authority in support of admission of the challenged evidence. The parties shall work together to prepare the Summary. Prior to submission of the Summary, the parties are encouraged to resolve evidentiary issues through stipulation.

June 10, 2011 Final proposed jury instructions or findings of fact and conclusions of law must be submitted. **(A courtesy copy shall be submitted to chambers at flsd_cookefl@flsd.uscourts.gov, in WordPerfect format)**, each party's list indicating each witness who will testify at trial, a one sentence synopsis of the testimony, and in consultation with opposing counsel, indicate the amount of time needed for direct and cross examination.

June 10, 2011 Pretrial conference. Usually 30 minutes are allotted for pretrial conference unless the parties or the Court, *sua sponte*, indicate a greater time is needed.

June 17, 2011 Trial Date.

N/A Date of any other deadline the parties adopt as part of their case management plan.