

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MIGUEL ANGEL CORBACHO DAUDINOT

Plaintiff,

CASE NO.: 1:13-cv-22589-KMW

v.

YASIEL PUIG VALDES a/k/a YASIEL PUIG and  
MARITZA VALDES GONZALEZ.

Defendants.

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**SCHEDULE PROPOSED BY THE PLAINTIFFS**

The parties were unable to come to an agreement on all of the pretrial deadlines in this case due to a fundamental disagreement on the time required to complete discovery in this matter. Plaintiff believes that there could be a substantial number of witnesses, depending on what the discovery reveals, many of who may live outside of Miami, Florida and even outside of the United States, while Defendants believe that there will be a limited number of witnesses and the case will therefore not require extensive discovery. The deadlines as agreed upon and suggested by the parties are detailed below:

This MATTER is set for trial for the week of November 9, 2015. The Parties request to adhere to the following schedule:

<b>Plaintiff's Dates</b>	<b>Defendants' Dates</b>	
21 days after the court decides Defendants' Motion to Dismiss	21 days after the court decides Defendants' Motion to Dismiss	The Parties shall furnish lists with names and addresses of fact witnesses. The Parties are under a continuing obligation to supplement discovery responses with ten (10) days of receipt or other notice of new or revised information.
November 15, 2014	November 15, 2014	The Parties shall file motions to amend pleadings or join Parties.
June 2, 2015	March 15, 2015	The Plaintiff shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(2).
June 16, 2015	April 15, 2015	The Parties shall exchange rebuttal expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(2).

July 30, 2015	May 30, 2015	The Parties shall complete all discovery, including expert discovery.
August 7, 2015	June 15, 2015	Parties shall complete mediation and file a mediation report with the Court.
August 21, 2015	July 15, 2015	The Parties shall file all dispositive pre-trial motions and memoranda of law.
September 10, 2015	August 31, 2015	The Parties shall file a joint pre-trial stipulation, as required by Local Rule 16.1(3) and final proposed jury instructions. Joint proposed jury instructions or conclusions of law (for non-jury trials) shall outline: 1) the legal elements of Plaintiff's claims, including damages; and 2) the legal elements of the defenses that are raised.
September 30, 2015	September 30, 2015	The Parties shall file witness and exhibit lists and all motions in limine. The witness list shall include only those witnesses the Parties actually intend to call at trial and shall include a brief synopsis of their testimony. The exhibit lists shall identify each witness that will introduce each exhibit.

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