IN THE UNITED STATES DISTRICT COURT FOR THE

WESTERN DISTRICT OF MISSOURI

SOUTHERN DIVISION

PLAINTIFF NAME, )

 )

 Plaintiff, )

 v. ) Case No. 00-00000-CV-S-DPR

 )

DEFENDANT NAME )

 )

 Defendant. )

PROPOSED SCHEDULING ORDER

 Pursuant to the Court’s Order on January 1, 2099, (Doc. X) and in accordance with Rules 16(b) and 26(f), Fed. R. Civ. P. and Local Rules 16.1 and 26.1, the parties submit the following Proposed Scheduling Order and Discovery Plan.

1. Scheduling Deadlines
	1. Date for Joinder of Parties: Click or tap to enter a date.
	2. Date for Amendment of Pleadings: Click or tap to enter a date.
	3. Plaintiff’s Expert Designation Deadline: Click or tap to enter a date.

(At least 60 days before discovery deadline)

* 1. Defendant’s Expert Designation Deadline: Click or tap to enter a date.

(30 days after Plaintiff’s Expert Designation)

* 1. Dispositive Motion Deadline: Click or tap to enter a date.

(Local Rule 16.1(d)(2) – within 30 days after close of discovery)

1. Discovery Plan
	1. Fed.R.Civ.P. 26(f) Conference was held/will be held on: Click or tap to enter a date.
	2. Fed.R.Civ.P. 26(a)(1) Disclosures were made/will be made on: Click or tap to enter a date.
	3. Discovery Deadline: Click or tap to enter a date.

(Not more than 180 days from submission of this proposed order)

* + 1. Local Rule 26.1(c)(2) - Statement of facts and issues and explanation for requesting a proposed discovery deadline more than 180 days from the filing of this proposed document:
	1. Discovery Motions will be filed at least \_\_\_\_\_\_ days before the close of discovery.
	2. Anticipated Protective Order: [ ] YES [ ]  NO
	3. Are there any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced?

[ ] YES [ ]  NO. If yes, please state the parties’ views and proposals:

1. Estimated number of days to try the action:
2. Proposed Trial Date: Click or tap to enter a date.

(150 days from dispositive motion deadline, or later)

Respectfully submitted,

*/s/ /s/*

Attorney Name, Bar No. xxxxx Attorney Name, Bar No. xxxxx

Firm Firm

Tel: Tel:

Fax: Fax:

Email: Email:

ATTORNEYS FOR PLAINTIFF(S) ATTORNEYS FOR DEFENDANT(S)