

Model Order

Superior Court of New Jersey  
Law Division, Civil Part  
\_\_\_\_\_ County

Docket Number: L- \_\_\_\_\_

\_\_\_\_\_  
Plaintiff(s),

v.

\_\_\_\_\_  
Defendant(s).

**Scheduling Order**

This matter having come before the Court for an Initial Conference, and for good cause shown,  
It is, on this (Day) day of (Month), 20 (Yr), **ORDERED** as follows:

- (1) R. 4:103-1 Disclosures of the parties must be served on all parties no later than fourteen (14) days from the date of the Initial Conference.
- (2) Service of initial written discovery to be completed by (date).
- (3) Maximum of (number) Interrogatories and document requests by each party to each other party (if other than the limits set forth in R. 4:104-4).
- (4) Maximum of (number) depositions to be taken by each party (if other than the limits set forth in R. 4:104-3).
- (5) Motions to amend pleadings or to add parties to be filed by (date).
- (6) Motions to resolve any privilege log disputes to be filed by (date).
- (7) Factual discovery to be completed by (date).
- (8) Plaintiff's expert report(s) due on (date).
- (9) Defendant's expert report(s) due on (date).
- (10) Any rebuttal reports due on (date).
- (11) Expert depositions to be completed by (date).
- (12) Discovery end date: (date)
- (13) Dispositive motions to be served within (number) days of discovery end date.
- (14) Tentative Status Conference Date (if necessary): (date)
- (15) Tentative Pre-Trial Conference Date: (date)
- (16) Tentative Trial Date: (date)

Dated: \_\_\_\_\_

\_\_\_\_\_  
J.S.C.

NOTE: The parties may agree to set and/or modify interim deadlines without court approval, provided that any such change will not have any impact on the discovery end date.

NOTE: The setting of the Tentative Trial Date, above, does not implicate the "exceptional circumstances" standard of R. 4:24-1(c), and discovery extensions may be considered for good cause shown.