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VS.

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AGREED DISCOVERY CONTROL PLAN ORDER

The Court acting sua sponte, pursuant to Rule 190.4, TRCP, finds that this action requires a Discovery Control Plan by order; it is accordingly;

ORDERED that the following schedule of deadlines is in effect pending further order of this court, and the following matters shall be accomplished on or before the following dates:

- 1. New parties joined and served; a party causing such Joinder shall provide copies of this order to the new party Or parties. _____
- 2. All paper discovery propounded by any party. _____
- 3. Designation of Experts by name, address and Current CV, and full reports for all Plaintiffs _____
- 4. Designation of Experts by name, address and Current CV and full reports for all Defendants _____
- 5. All discovery conducted by (the parties may Extend Rule 11 Agreement) _____
- 6. All Dispositive Motions and Robinson/Havner Motions filed _____
- 7. ADR Deadline _____
- 8. Pre-trial conference (see instruction sheet) All Objections relating to discovery brought forward For hearing; any such objections not brought forward

For hearing this date will be considered abandoned
And will be overruled.

9. Trial for the month of _____

Reports are not required for treating health care providers.

Mediation shall be at a time and place, and before a mediator, as agreed by the parties; if the parties do not agree, the parties shall notify the Court at least 30 days prior to the deadline. Whether or not the time, place, and mediator are agreed, all parties must attend individually; corporations must have present an individual with full authority; all insurers must attend through a person with full authority.

Robinson/Havner motions must be brought forward for hearing before or at the pre-trial hearing; failing which the Robinson Havner motions will be considered as abandoned or waived; and as such will be overruled. Whether at the pre-trial hearing or otherwise, the motion must be specifically set for hearing with notice to all parties and to the court. The court coordinator must be advised of the amount of time requested for such hearing. In the absence of a specific request, the court will allocate 15 minutes (total, for all parties) for the hearing on all such motions pending herein.

The discovery limitations of Rule 190.3 TRCP, shall apply, in satisfaction of the requirement in Rule 190.4(b)(3).

The deadlines herein shall remain in effect even though the case is not tried as scheduled above. THERE WILL BE NO CONTINUANCES GRANTED.

Signed this _____ day of _____, 20____.

JUDGE MILTON GUNN SHUFFIELD

AGREED:

COUNSEL FOR PLAINTIFF

COUNSEL FOR DEFENDANT