

Procedure and the Local Rules of the Southern District of New York. The following interim deadlines may be extended by the parties on consent without application to the Court, provided that the parties meet the deadline for completing fact discovery set forth in ¶ 7, above.

- a. Initial requests for production of documents shall be served on or before _____.
 - b. Initial interrogatories shall be served on or before ___.
 - c. The parties shall substantially complete their respective document productions on or before _____.
 - d. Depositions shall be completed on or before _____.
 - i. Absent an agreement between the parties or an order from the Court, depositions shall not be held until all parties have responded to initial requests for document production.
 - ii. There is no priority for depositions by reason of a party's status as a plaintiff or a defendant.
 - iii. Absent an agreement between the parties or an order from the Court, nonparty depositions shall follow initial party depositions.
 - e. Requests for admissions shall be served on or before _____.
9. All expert discovery, including disclosures, reports, production of underlying documents, and depositions shall be completed on or before _____. [*The parties shall be prepared to describe their contemplated expert discovery and the bases for their proposed deadlines at the initial conference.*]
- a. All affirmative expert disclosures and reports pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure shall be made on or before ___.
 - b. Rebuttal expert disclosures and reports pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure shall be made on or before _____.
 - c. Reply expert disclosures and reports shall be made on or before ___.
 - d. Expert depositions shall be completed on or before _____.
10. All discovery shall be completed on or before _____.

11. The Court will conduct a post-discovery conference on _____ at _____. ***[To be completed by the Court.]*** No later than two weeks in advance of the conference, the parties are to submit a joint letter updating the Court on the status of the case, including but not limited to whether either party intends to file a dispositive motion and what efforts the parties have made to settle the action. If either party contemplates filing a dispositive motion, the parties should be prepared to discuss a briefing schedule at the post-discovery conference.
12. Unless otherwise ordered by the Court, the joint pretrial order and additional submissions required by Rule 6 of the Court's Individual Rules and Practices shall be due 30 days from the close of discovery, or if any dispositive motion is filed, 30 days from the Court's decision on such motion. This case shall be trial ready 60 days from the close of discovery or from the Court's decision on any dispositive motion.
13. Counsel for the parties propose the following alternative dispute resolution mechanism for this case:
- a. _____ Referral to a Magistrate Judge for settlement discussions.
 - b. _____ Referral to the Southern District's Mediation Program. *[Note that all employment discrimination cases, except cases brought under the Fair Labor Standards Act of 1938, 29 U.S.C. § 201 et seq., are designated for automatic referral to the Court's Alternative Dispute Resolution program of mediation. Accordingly, counsel in such cases should select 13(b).]*
 - c. _____ Retention of a private mediator.

The use of any alternative dispute resolution mechanism does not stay or modify any date in this Order.

14. The parties have conferred and their present best estimate of the length of trial is _____.

SO ORDERED.

Dated:

New York, New York

Timothy M. Reif, Judge
United States Court of International Trade
Sitting by Designation
United States District Court for the
Southern District of New York