

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

\_\_\_\_\_  
Plaintiff(s),  
v. \_\_\_\_\_  
Defendant(s).

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)

Case No. \_\_\_\_\_

**STIPULATED DISCOVERY SCHEDULE/ORDER**

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(3):

1. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before \_\_\_\_\_.
2. The parties shall serve all interrogatories and requests for production on or before \_\_\_\_\_.
3. Depositions of all non-expert witnesses shall be completed by \_\_\_\_\_.
4. Plaintiff shall submit expert witness reports on or before \_\_\_\_\_.  
Depositions of plaintiff's expert witnesses shall be completed by \_\_\_\_\_.
5. Defendant shall submit expert witness reports on or before \_\_\_\_\_.  
Depositions of defendant's expert witnesses shall be completed by \_\_\_\_\_.
6. The Early Neutral Evaluation session shall be conducted on \_\_\_\_\_ at \_\_\_\_\_.m.  
The parties have agreed that \_\_\_\_\_ will serve as the early neutral evaluator.

**(Note: Paragraph 6 only applies to ENE-eligible cases pursuant to Local Rule No. 16.1.)**

7. The parties shall serve all requests for admission on or before \_\_\_\_\_.
8. All discovery shall be completed by \_\_\_\_\_ (no later than 8 months after filing of the Answer or Third-Party Answer).

9. Motions for joinder of parties and amendments to the pleadings shall be filed on or before \_\_\_\_\_.

10. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before \_\_\_\_\_.

11. This case shall be ready for trial by \_\_\_\_\_.

\_\_\_\_\_  
*Date*

\_\_\_\_\_  
*Counsel for Plaintiff(s)*

\_\_\_\_\_  
*Date*

\_\_\_\_\_  
*Counsel for Defendant(s)*

**APPROVED and SO ORDERED:**

\_\_\_\_\_  
U.S. District/Magistrate Judge

Date: \_\_\_\_\_