

**APPENDIX A. JOINT CASE MANAGEMENT STATEMENT
AND PROPOSED ORDER**

COMMONWEALTH OF MASSACHUSETTS

)	The Superior Court
)	Case Number: 16xxCVxxxxx
)	
Plaintiff(s))	JOINT CASE MANAGEMENT
)	STATEMENT & PROPOSED ORDER
)	
vs.)	
)	
)	
Defendant(s))	
)	
)	
)	
)	

The parties to the above-entitled action jointly submit this JOINT CASE MANAGEMENT STATEMENT & PROPOSED ORDER pursuant to Standing Order 1-88.

- **Legal Issues:**
A brief statement, without extended legal argument, of the disputed points of law, including reference to specific statutes and decisions.

- **Motions:**
All prior and pending motions, their current status, and any anticipated motions.

- **Amendment of Pleadings:**
The extent to which parties, claims, or defenses are expected to be added or dismissed and a proposed deadline for amending the pleadings.

- **Discovery:**
Discovery taken to date, if any, the scope of anticipated discovery; preservation issues as to discoverable materials.

- **Relief:**
All relief sought through complaint or counterclaim, including the amount of any damages sought and a description of the bases on which damages are calculated.

- **Settlement and ADR:**
Settlement and ADR efforts to date, including specifics of any ADR plan for the case, and a description of key discovery or motions necessary to position the parties to negotiate a resolution.
- **Scheduling:**
Proposed dates for designation of experts, discovery cutoff, hearing of dispositive motions, pretrial conference and trial.
- **Other:**
Such other matters as may facilitate the just, speedy and inexpensive disposition of this matter.

Dated:

Counsel for plaintiff

Dated:

Counsel for defendant

CASE MANAGEMENT ORDER

The above JOINT CASE MANAGEMENT STATEMENT & PROPOSED ORDER is approved as the Case Management Order for this case and all parties shall comply with its provisions. [in addition, the Court makes the further orders stated below.]

IT IS ORDERED.

Dated:

ASSOCIATE JUSTICE OF THE SUPERIOR COURT