

IN THE CIRCUIT COURT FOR THE FOURTH JUDICIAL CIRCUIT
MARION COUNTY, ILLINOIS

_____,)
)
Plaintiff,)
)
v.) No. 20__ - __ - ____)
)
_____,)
)
Defendant.)

CASE MANAGEMENT ORDER

This matter comes before the Court for a Case Management Conference; the parties being present or having stipulated to entry of this Case Management Order, this court hereby finds and orders as follows:

1. If the parties are not yet at issue, all proposed amendments or motions with respect to pleadings shall be filed by _____.
2. Each party to this action shall be allowed to take ____ discovery depositions. The method of taking and the duration of each deposition shall be as provided by Supreme Court Rule.
3. Plaintiff shall disclose witnesses pursuant to Supreme Court Rule 213 by _____; and the same shall be deposed, if at all, by _____.
4. Defendant shall disclose witnesses pursuant to Supreme Court Rule 213 by _____; and the same shall be deposed, if at all, by _____.
5. Plaintiff shall disclose rebuttal witnesses pursuant to Supreme Court Rule 213 by _____; and the same shall be deposed, if at all, by _____.
6. All discovery shall be completed by _____ (at least 60 days prior to the first day of trial).
7. This matter is set for a Final Pre-Trial / Pre-Trial (*circle one*) Conference on _____, 20__ at _____m. Further Pre-Trial Conferences may then be set in the discretion of the court. At least seven (7) days prior to any designated Final Pre-Trial Conference, the parties shall submit to one another and to this court any proposed amendments to

pleadings and any motions *in limine* as may require determination at or before the trial of the matter, any dispositive motions requiring determination, all proposed jury instructions (if set for jury trial) including alternatives as necessary, and a Final Pre-Trial Memorandum identifying and including each of the following:

- a. Names and current residence and business addresses of each of the parties hereto and their respective counsel;
- b. A concise statement of the nature of the case;
- c. A statement of the issues to be presented at trial;
- d. A statement identifying any and all proposed stipulations;
- e. A list of the names and addresses of all witnesses (lay/independent and controlled expert witnesses) anticipated to testify at trial, together with a concise statement of the subject of each such witness's testimony;
- f. A list and copies of each exhibit anticipated to be presented at trial with each properly identified (Plaintiff's Exhibit ___/Defendant's Exhibit ___);
- g. A summary statement of the Plaintiff's medical "special damages", if any, together with copies of vouchers evidencing each charge and the satisfaction of the same; and
- h. A statement of Plaintiff's lowest "demand" for the settlement of the matter, and a statement of Defendant's highest "offer" for settlement of the matter.

8. At any Final Pre-Trial Conference, counsel shall either have authority to settle, shall have present an individual with authority to settle, or shall be able to reach an individual with authority to settle during the Final Pre-Trial Conference.

9. All dispositive motions shall be filed with the Circuit Clerk no later than _____ (at least 30 days prior to the first day of trial) and noticed to be heard (in accordance with Supreme Court Rules and Local Rules) at or prior to any Final Pre-Trial Conference.

10. This matter is set for Jury / Bench (*circle one*) Trial on _____, 20__, at _____.m. No motion to continue the trial setting as set forth herein shall be granted unless by agreement of the parties hereto or upon good cause shown.

11. In the event that either party desires that a further or amended Case Management Order should be entered herein, the parties hereto shall first attempt to agree to the terms and conditions of the same; but failing such agreement may submit that matter to the court for further determination upon motion and notice duly provided.

Entered this date: _____.

Judge