

1 [YOUR NAME]  
2 [YOUR ADDRESS]  
3 Telephone: [YOUR PHONE NUMBER]  
4 [YOUR E-MAIL ADDRESS]  
5 Fax: [YOUR FAX NUMBER]

6 STATE OF ARIZONA  
7 MARICOPA COUNTY SUPERIOR COURT

8 \_\_\_\_\_, a [single/married  
9 man/woman],

10 Plaintiff,

11 v.

12 [Name of Defendant] and Jane Doe [last  
13 name of defendant], husband and wife;  
14 JOHN DOES 1-5; JANE DOES 1-5;  
15 BLACK CORPORATIONS 1-5; and  
16 WHITE PARTNERSHIPS 1-5,

17 Defendants.

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

JOINT PROPOSED  
SCHEDULING ORDER

(Assigned to the Honorable  
[name of the judge])

18 The parties hereto, through counsel undersigned, hereby submit their Proposed Scheduling  
19 Order in preparation for the telephonic Rule 16 Scheduling Conference which will be scheduled  
20 before the Honorable [Judge's name].

21  
22 1. **Initial Disclosure:** The parties have exchanged their initial disclosure statements, or  
23 will exchange them no later than **September 25, 2014**.

24 2. **Expert witness disclosure:**

25 a. Plaintiff shall disclose areas of expert testimony by **December 17, 2014**, and  
26 Defendant shall disclose areas of expert testimony by, **February 16, 2015**.

27 b. Plaintiff shall disclose the identity and opinions of experts by **March 16,**  
28

1           **2015**, and Defendant shall disclose the identity and opinions of experts by **April 20, 2015**.

2           3.       ***Lay (non-expert) witness disclosure:*** The parties shall disclose all lay witnesses by  
3 **June 4, 2015**.

4           4.       ***Final supplemental disclosure:*** Each party shall provide final supplemental  
5 disclosure by **August 20, 2015**. This order does not replace the parties' obligation to seasonably  
6 disclose Rule 26.1 as information on an on-going basis and as it becomes available.

7  
8           **No party shall use any lay witness, expert witness, expert opinion, or exhibit at trial not  
9 disclosed in a timely manner, except upon order of the court for good cause shown or  
10 upon a written or an on-the-record agreement of the parties.**

11           5.       ***Discovery deadlines:*** The parties will propound all discovery undertaken pursuant  
12 to Rules 33 through 36 by **June 18, 2015**. The parties will complete the depositions of parties and  
13 lay witnesses by **August 6, 2015**, and will complete the depositions of expert witnesses by **August  
14 6, 2015**. The parties will complete all other discovery by **August 6, 2015**. ("Complete discovery"  
15 includes conclusion of all depositions and submission of full and final responses to written  
16 discovery.)

17  
18           6.       ***Private Mediation:*** The parties remaining in this action shall participate in private  
19 mediation using a private mediator agreed to by the parties. The parties shall complete the  
20 mediation by **August 20, 2015**.

21           All attorneys and their clients, all self-represented parties, and any non-attorney  
22 representatives who have full and complete authority to settle this case shall personally  
23 appear and participate in good faith in this mediation, even if no settlement is expected.  
24 However, if a non-attorney representative requests a telephonic appearance and the mediator  
25 grants the request prior to the mediation date, a non-representative may appear  
26 telephonically.

27           7.       ***Dispositive Motions:*** The parties shall file all dispositive motions by **September 21,  
28 2015**.

8.       ***Trial setting conference:*** On \_\_\_\_\_ [the court will provide this date],

1 the court will conduct a telephonic trial setting conference. Attorneys and self-represented parties  
2 shall have their trial calendars available for the conference. Plaintiff shall initiate the conference  
3 call by arranging for the presence of all other counsel and self-represented parties, and by calling  
4 this division at [Courtroom number] promptly at the scheduled time.  
5

6 **NOTE:** This Court utilizes FTR for an electronic record of the proceedings. However, any  
7 party may request the presence of a court reporter by contacting the Division three (3) court  
8 business days before the scheduled hearing.

9 9. **Firm dates:** No stipulation of the parties that alters a filing deadline or a hearing  
10 date contained in this scheduling order will be effective without an order of this court approving the  
11 stipulation. Dates set forth in this order that govern court filings or hearings are FIRM dates, and  
12 may be modified only with this court's consent and for good cause. This court ordinarily will not  
13 consider a lack of preparation as good cause.  
14

15 10. **Further orders:** The court further orders as follows:

16 a. Rule 38.1 of ARCP is waived unless and until otherwise ordered by the  
17 Court.  
18

19 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2015.

20 [YOUR NAME]

LAW OFFICES OF [DEFENSE COUNSEL]

21  
22 By \_\_\_\_\_

By \_\_\_\_\_

23 [Your name]  
24 [Your address]  
[your e-mail]  
*Pro Per*

[Defense counsel name]  
[Defense counsel address]  
[Defense counsel e-mail]  
*Attorneys for Defendant*

25  
26  
27 **ORIGINAL** of the foregoing electronically  
28 filed/delivered this \_\_\_\_\_ day of \_\_\_\_\_,  
2015, to:

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Clerk of the Court  
Maricopa County Superior Court

The Honorable [Judge's name]  
Maricopa County Superior Court

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