

STATE OF VERMONT
COUNTY OF _____, ss.

Plaintiff(s)
V.
Defendant(s)
Superior Court
Docket No. _____

DISCOVERY/ALTERNATE DISPUTE RESOLUTION STIPULATION AND ORDER

The parties to the above-entitled cause stipulate that the Court may order the following ADR and Discovery Schedule:

- 1. All pretrial motions, except those based on circumstances that arise after the cut-off date or a motion to dismiss for lack of subject matter jurisdiction shall be filed by _____ Motions in Limine must be filed by the date of Jury Drawing on issues known to counsel at that time.
2. Third parties shall be brought into the action pursuant to V.R.C.P. 14 no later than _____
3. All Written Discovery shall be sent to the opposing party no later than _____ Answers thereto shall be sent no later than as required by Rule.
4. Plaintiff shall disclose experts by _____ Defendant shall depose those experts, if it chooses to do so by _____.
5. Defendant shall disclose experts by _____ Plaintiff shall depose those experts, if it chooses to do so by _____.
6. Depositions of all witnesses other than expert witnesses shall be scheduled and taken no later than _____.
7. All compulsory medical examinations, if required, shall be scheduled and have been conducted by _____.
8. The parties shall agree to one of the following ADR procedures as set forth in V.R.C.P. Rule 16.3.

- [] Mediation _____ (or) [] We agree to accept a neutral from list provided by the clerk
Name of Neutral(s), if agreed
[] Binding Arbitration _____ (or) [] We agree to accept a neutral from list provided by the clerk
Name of Neutral(s), if agreed
[] Neutral Evaluation _____ (or) [] We agree to accept a neutral from list provided by the clerk
Name of Neutral, if agreed
[] Other Method Proposed Agreement and procedure shall be submitted to the Court for approval.

9. Agreement, if any, concerning the payment of the neutral's fees and expenses shall be submitted with this Stipulation.

10. The Alternate Dispute Resolution Session shall be completed by _____, 20__ .
Please specify one of the following options:

- [] A. Case Statements, if appropriate, shall be filed with the neutral by _____.
Necessary Discovery shall be completed by _____.
[] B. We agree to accept the assistance of the designated neutral in setting a schedule for completion of the process.

11. Discovery shall be complete and this case ready for trial by _____ Estimated Length of Trial: ___ day(s) or ___ hours(s).

Attorney for Plaintiff Date
Attorney for Defendant Date
Attorney for Defendant Date
Attorney for Defendant Date

APPROVED AND ORDERED: Presiding Judge, _____ Superior Court Date