IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

Administrative Order 2025-24-Civ

ESTABLISHMENT & IMPLEMENTATION OF CIVIL CASE MANAGEMENT PLAN

(a) Pursuant to Article V, section 2(d) of the Florida Constitution, and section 43.26, Florida Statutes, the chief judge of each judicial circuit is charged with the authority and the power to do everything necessary to promote the prompt and efficient administration of justice.

(b) Florida Rule of General Practice and Judicial Administration 2.215(b)(3) states the chief judge "ensures the efficient and proper administration of all courts within [this] circuit, considering available resources."

(c) Pursuant to Florida Rule of General Practice and Judicial Administration 2.545(a), (b) and (e), judges are required to conclude litigation as soon as it is reasonably and justly possible, to take charge of cases at an early stage, and to control the progress of cases. It is recognized, however, there are cases that, because of their complexity, present problems that cause reasonable delays. Notwithstanding, most cases should be completed within the time periods set forth in Florida Rule of General Practice and Judicial Administration 2.250.

(d) Florida Supreme Court Administrative Order AOSC23-0962 (December 5, 2024), adopted changes to the Florida Rules of Civil Procedure, effective January 1, 2025 to promote the fair and timely resolution of civil cases and to codify active case management for civil cases, including the use of Case Management Orders requiring specific deadlines according to whether a case is categorized as complex, streamlined or general.[1]

(e) Florida Supreme Court Administrative Order AOSC23-0837 (March 21, 2024) approved the amendments to the Florida Rules of General Practice and Judicial Administration, effective July 1, 2024 to promote efficient case management.[2]

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[1] Effective January 1, 2025: Rule 1.200 (Case Management rewritten); (Pretrial Procedure, amended; Rule 1.201 (Complex Litigation amended); Rule 1.280 (General Provisions Governing Discovery amended); Rule 1.440 (Setting Action for Trial, amended); and Rule 1.460 (Motion to Continue Trial, amended).

[2] Effective July 1, 2024: Florida Rules of General Practice and Judicial Administration, Rules 2.215 (Trial Court

(f) Florida Supreme Court Administrative Order AOSC24-0662 (December 5, 2024), adopts a new Florida Rule of Civil Procedure 1.202 (Conferral Prior to Filing Motions) and amends Florida Rule of Civil Procedure 1.510 (Summary Judgement).

(g) In accordance with the authority vested in the Chief Judge by Article V, section 2(d) of the Florida Constitution, section 43.26, Florida Statutes, Florida Rule of General Practice and Judicial Administration 2.215, and pursuant to Florida Supreme Court Administrative Orders: AOSC23-0837 (March 21, 2024), AOSC-0962 (December 5, 2024) and AOSC24-0662 (December 5, 2024), it is hereby **ORDERED:**

(1) All Seventeenth Judicial Circuit and Broward County Judges are to strictly comply with the requirements of Florida Rule of General Practice and Judicial Administration 2.545(a), (b), and (e), and SC2023-0837 (March 21, 2024) which respectively require judges to conclude litigation as soon as it is reasonably and justly possible to do so, to take charge of all cases at an early stage and to actively control the progress of the cases thereafter until they are determined, and to apply a firm continuance policy allowing continuances only for good cause shown.

(2) All attorneys practicing in the Seventeenth Judicial Circuit must strictly comply with Florida Rule of General Practice and Judicial Administration 2.545(a), which requires attorneys to conclude litigation as soon as it is reasonably and justly possible to do so.

(3) Consistent with the dictates above and in compliance with SC2023-0962 (December 5, 2024) and, there is established in the Seventeenth Judicial Circuit a Civil Case Management Plan as set forth herein, applicable to all civil cases,[3] which will be administered for the implementation of enhanced case management procedures and guidelines for the timely and efficient processing of civil cases.

Administration, amended); 2.250 (Time Standards for Trial and Appellate Courts and Reporting Requirements amended); Rule 2.546 (Active and Inactive Case Status, new); 2.550 (Calendar Conflicts, amended); and Form 2.604 (Notice of Pending Matter); Form 2.604 (Notice of Inactive Status) and Form 2.606 (Notice of Active Status), amended or added.

[3] For purposes of this Administrative Order the term "civil case" means actions to which the Florida Rules of Civil Procedure apply, as identified in Florida Rule of Civil Procedure 1.010, and actions in which the court has ordered that the action proceed under one or more of the Florida Rules of Civil Procedure pursuant to Florida Small Claims Rule 7.020(c) if the deadline for the trial date specified in Florida Small Claims Rule 7.090(d) no longer applies in the action, but does not include actions subject to section 51.011, Florida Statutes, post-judgment proceedings, writs to which Florida Rule of Civil Procedure 1.630 applies, and those excluded by Fla. R. Civ. P. 1.200.

(4) The Civil Case Management Plan is to be used for the purpose of establishing time standards, improving the court's ability to provide early and continuous management of civil cases as required by Florida Rule of General Practice and Judicial Administration 2.545, and to promote uniformity of practice throughout the Seventeenth Judicial Circuit.

(5) The procedures and time standards set forth herein are intended to facilitate the timely, fair and effective resolution of civil cases consistent with the time frames set forth in Florida Rule of General Practice and Judicial Administration 2.250 while ensuring the efficient use of court resources. The procedures and time standards do not supplant any existing rule, statute, or law and comply with the changes in Florida Rule of Civil Procedure as adopted by the Florida Supreme Court in SC2023-0962 (December 5, 2024), SC2023-0837 (March 21, 2024) and SC 2024-0662 (December 5, 2024).

Case Track Assignment:

(1) Not later than 120 days after an action commences as provided in Rule 1.050, the court must assign each civil case to one of three case management tracks: streamlined, general, or complex based upon information listed on the Civil Cover Sheet and according to the case classifications attached hereto, as Exhibit "A". After the initial designation as complex, streamlined, or general, a track assignment may be changed by the court on its own motion or a change can be requested by a party upon a motion promptly filed after the appearance of good cause to support the motion. Any case initially designated as streamlined or general must comply with Administrative Order 2025-22-Civ, as such may be amended from time to time, before being designated complex and assigned to a complex litigation division. Nothing herein prohibits a judge presiding over a general civil division from declaring an action complex and directing that the action remain in his or her general civil division for disposition.

a. Complex Case Track. The complex case track involves those actions with extraordinary complexity as to require or benefit from early intervention and individual judicial management, and are those cases that have been or may be designated by court order as complex under Florida Rule of Civil Procedure 1.201, or which may be direct filed to a complex litigation division or declared complex and assigned to a complex litigation division pursuant to Seventeenth Judicial Circuit Administrative Order 2025-22-Civ. Due to the nature of cases filed in County Court, cases qualifying for this designation in County Court should be extremely rare and must be approved for such designation in

writing by the Chief Judge or the Administrative Judge of County Court.

b. Streamlined Cases. Streamlined cases are those cases that reflect mutual knowledge of the underlying facts and normally requiring little judicial intervention and which have relatively simple procedural and legal issues that can be resolved promptly by early referral to mediation, Alternative Dispute Resolution or expedited hearing. Notwithstanding the case classifications attached hereto, to determine whether a case is streamlined, the presiding judge shall consider whether the case involves:

   i. Few parties;
   ii. Non-complex issues related to liability and damages;
   iii. Few anticipated dispositive pretrial motions;
   iv. Limited need for discovery;
   v. Few witnesses;
   vi. Minimal documentary evidence;
   vii. An anticipated trial length of less than three (3) days; and
   viii. Any other factor relevant to proper case management.

c. General Cases. These cases represent the large majority of standard civil cases that do not meet criteria of streamlined or complex.

(2) **Time Standards & Goals**. The time standards set forth herein are directives established by Florida Supreme Court Administrative Order AOSC2023-0837 (March 21, 2024) and Florida Rule of General Practice and Judicial Administration 2.250, and are intended to be presumptively reasonable time periods for disposition of civil cases in trial courts except where periods where a case is on inactive status which are excluded from the time periods set forth herein. Deadlines are strictly enforced in accordance with Fla. R. Civ. P. 1.200. However, upon a showing of extraordinary circumstances, certain unique cases may have cause for reasonable delay beyond these periods. Most cases should, however, be completed within the following time periods and the presiding judge shall take appropriate action to manage new and existing cases to bring such matters to disposition within such times[4]:

a. Complex cases: disposed within 30 months
b. General cases: disposed within 18 months
c. Streamlined cases: disposed within 12 months
d. Small Claims: 95 days from commencement of action, as

[4] Time begins from the date of service of initial process on the last defendant or 120 days after commencement of the action as provided in Florida Rule of Civil Procedure 1.050, whichever occurs first.

provided in Florida small claims Rule of Procedure 7.050.

(3) **Assignment to Case Tracks – General and Streamlined Cases**

a. A case classification is determined upon filing the initial complaint in accordance with the classifications set forth in Exhibits "A" for Circuit Civil Cases and "M" for County Court Cases.

b. Disagreement as to case classification. If the parties do not agree to the classification of the case as general or streamlined, the presiding judge shall determine the appropriate designation upon motion. The moving party shall bear the burden of demonstrating the propriety of the case classification, unless all parties agree to a designation.

(4) **Assignment to Case Track – Complex**

a. Circuit Court
   i. For assignment of a case to a complex litigation division (business or tort) the parties must comply with Administrative Order 2025-22-Civ.
   ii. Establishing Procedures for Direct Filing or Reassignment of Circuit Civil Cases to a Complex Business or Complex Tort Division, as such may be amended from time to time. This does not preclude a civil case from being designated complex by the presiding judge of a general civil division and such case remaining in a general civil division.

b. County Court
   i. Motion by Parties. Any party to a County Court civil action may file a written motion with a courtesy copy provided to the assigned division judge requesting the case be designated as complex. Upon receipt, the motion should be referred to the Chief Judge or Administrative Judge for the County Court for ultimate determination.
   ii. On Court's Order. If the division judge, after receipt of all the pleadings believes there is a colorable basis for designating the matter complex, the case shall be referred to the Chief Judge or Administrative Judge for the County Court for ultimate determination.

iii. In those extremely rare cases in which the Court issues an order designating a county court civil case as complex, the parties shall be required to comply with the procedures for complex cases as set forth in Administrative Order 2025-22-Civ, as such may be amended from time to time, and Florida Rule of Civil Procedure 1.201.

(5) **Case Management Procedures**

a. Complex Cases:
Case Management Order must be issued as provided by Rule 1.201, Florida Rule General Practice and Judicial Administration. The Case Management Order outlining required time periods for Complex Cases is attached as Exhibits "D" and "F" for Business and Tort, respectively, and the Uniform Trial Order, attached as Exhibits "E" and "G", Business and Tort cases, respectively.

b. Streamlined and General Cases:
No later than 120 days after commencement of an action as provided in Fla. R. Civ. P. 1.050, or 30 days after service of complaint of the last defendant, whichever is first, the court must issue a Case Management Order specifying projected or actual trial period setting deadlines consistent with time standards specified in Fla. R. Civ. P. 2.250(a)(1)(B) for completion of civil case. The Case Management Order for Streamlined Cases is attached as Exhibit "H" and the Uniform Trial Order is attached as Exhibit "I", which must specify no less than the following deadlines:

i. service of complaint;
ii. service of extension;
iii. adding new parties;
iv. completion of fact discovery;
v. completion of expert discovery;
vi. resolution of all objections to pleadings;
vii. resolution of Pre Trial motions; and
viii. completion of Alternative Dispute Resolution.

(6) **Uniform Trial Order and Uniform Case Management Order:**

a. The presiding judge must assign a projected trial date which must be consistent with the time periods set forth in Florida Rule of General Practice and Judicial Administration 2.250(a)(1)(B) and which must be set

forth in the appropriate Uniform Case Management Order and Uniform Trial Order.

b. The Case Management Orders outlining required time periods and issued by the presiding judge are attached hereto and made a part here of as Exhibits "B" (CMO for Circuit Civil General Track); "C" (UTO for Circuit Civil General Track); "D" (CMO for Business Complex Cases); "E" (UTO for Business Complex Cases); "F" (CMO for Tort Complex Cases); "G" (UTO for Tort Complex Cases); "H" (CMO for Circuit Civil Streamlined Track); "I" (UTO for Circuit Civil Streamlined Track); "J" (CMO for County Civil Streamlined Cases); and "K" (CMO for County Civil General Cases).

(7) **Notice of Pending Matter:**

a. Parties have a continuing duty to notify the court of the existence of similar action or proceedings pending before another court by serving a Notice of Pending Matter as required by the Case Management Order and using Form 2.604, attached as Exhibit "L".

(8) **Conferral Prior to Filing Motions:**

a. A represented movant must confer with the opposing party in a good-faith effort to resolve the issues raised in non-dispositive motions, not exempt in Fla. R. Civ. P. 1.202(c), in accordance with Fla. R. Civ. P. l.202(a)

b. Sanctions may result for failure to comply with the requirements of Fla. R. Civ. P. 1.202.

This Administrative Order vacates and supersedes Administrative Order 2024-26-Civ (Amendments 1 and 2) and all prior inconsistent Administrative Orders. The Exhibits to this Administrative Order may be amended from time to time without the necessity of amending the Administrative Order.

DONE AND ORDERED in Chambers, Fort Lauderdale, Broward County, Florida, this 24th day of July, 2025.

/s/ Carol-Lisa Phillips
Carol-Lisa Phillips, Chief Judge

EXHIBIT "A" (Circuit Civil)

Pathway	Case Type
STREAMLINED	Condominium RPMF –Commercial RPMF –Homestead RPMF -Non-Homestead Bond Entreasure Replevin Declaratory Judgment Equitable Relief Construction Lien Credit Card
GENERAL	Contract & Indebtedness Resid. Premises Liability Auto Negligence Other Negligence Injunctive Relief Insurance Claim Civil Forfeiture Negligent Security Commercial Premises Liability Discrimination - Employment or Other Libel / Slander Eminent Domain Product Liability Business Malpractice Medical Malpractice Other Professional Malpractice Business Torts Construction Defect Nursing Home Negligence Antitrust / Trade Regulation Business Transactions Challenge - Statute or Ordinance Challenge - Proposed Amendment Intellectual Property Shareholder Derivative All other Civil Case Types Not Listed

COMPLEX	Cases direct filed as complex and assigned to a complex litigation division pursuant to Administrative Order 2025-22-Civ or otherwise determined complex by the presiding judge

EXHIBIT "B"

UNIFORM CASE MANAGEMENT ORDER
(CIRCUIT CIVIL GENERAL TRACK)

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE DEADLINES LISTED HEREIN **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND A MANDATORY CASE MANAGEMENT CONFERENCE MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND. (Fla. R. Civ. P. 1.200(j)(6)).

THIS CASE MANAGEMENT ORDER SUPERSEDES ANY PRIOR CASE MANAGEMENT ORDER ENTERED IN THIS CASE.

This case has been designated to the **GENERAL CIVIL TRACK**. The deadlines established by this Order are to ensure the case is disposed of within 18 months from the date of service of initial process on the last defendant or 120 days after commencement of the action as provided in rule 1.050, whichever occurs first. Accordingly, the following procedures and deadlines shall be strictly observed by the parties and enforced by the court:

1. SCHEDULING OF A MANDATORY CASE MANAGEMENT CONFERENCE:

   ☐(Applicable if checked): A **MANDATORY** Case Management Conference will be held on zoom (_____) or in Courtroom _____ on _____ at _____ am/pm.

   During the case management conference, the Court may elect to hear any pending motion, even if the parties have not identified the motion as an issue to be resolved. Motions for summary judgment and matters requiring an evidentiary hearing may not be heard unless agreed to by the parties and the court. (Fla. R. Civ. P. 1.200(j)(2)).

   On any matters ruled upon, unless otherwise ordered, within five (5) days following the Case Management Conference, counsel for Plaintiff(s) shall prepare an order pursuant to Florida Rule of Civil Procedure 1.200(j)(5).

2. COMPLAINT: The Complaint shall be served within 120 days of filing. Failure to perfect service within 120 days shall subject the action to dismissal without prejudice or dropping of that party as a defendant. If plaintiff shows good cause or excusable neglect for failure to serve within 120 days, the court shall extend the time for service for an appropriate period. (Fla. R. Civ. P. 1.070(j)).

3. NOTICE OF SERVICE OF COMPLAINT: Upon service of the complaint on the last of all named defendants in a civil action, the plaintiff will file a Notice of Service and provide a courtesy copy of the Notice of Service to the assigned trial judge. A fillable PDF form "Notice of Service" is available on the Circuit's webpage (www.17th.flcourts.org).

4. TRIAL: Trial will be set in accordance with Florida Rule of Civil Procedure 1.440. The court will issue a separate Uniform Trial Order scheduling Calendar Call and setting the Trial Period. The action no longer needs to be "at issue" prior to the case being set for trial. The failure of the pleadings to be closed will not preclude the court from setting a case for trial. (Fla. R. Civ. P. 1.440).

5. INITIAL DISCOVERY DISCLOSURES:

   A. Parties must make initial discovery disclosures required by Florida Rule of Civil Procedure 1.280 **within 60 days after the service of the complaint or joinder**, unless a different time is set by court order. Pursuant to Local Rule 10A, a party may file a motion for ex parte relief where no motion for extension of time has been filed and the nonmoving party has completely failed to comply with Florida Rule of Civil Procedure 1.280(a).

   B. A party may not seek discovery from any source before that party's initial disclosures are served on the other party, except when authorized by stipulation or by court order. (Fla. R. Civ. P. 1.280(f)(1)).

   C. As set forth in Rule 1.280(a)(1), initial discovery disclosures include:
      1. The name and, if known, the address, telephone number, and e-mail address of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;
      2. A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control (or, if not in the disclosing party's possession, custody, or control, a description by category and location of such information) and may use to support its claims or defenses, unless the use would be solely for impeachment;
      3. A computation for each category of damages claimed by the disclosing party and a copy of the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; provided that a party is not required to provide computations as to noneconomic damages, but the party must identify categories of damages claimed and provide supporting documents; and
      4. A copy of any insurance policy or agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

   D. A party who has made a disclosure under this rule or who has responded to an interrogatory, a request for production, or a request for admission **must** supplement or

correct its disclosure or response: (a) in a timely manner if the party learns that in some material respect the disclosure or response is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing; or (b) as ordered by the court. (Fla. R. Civ. P. 1.280(g)).

6. NOTICE OF RELATED CASE(S) (i.e., cases involving the same parties, same subject matter or incident, or same property at issue): The Parties shall file a Notice of Related Case(s) within thirty (30) days from the date of this Order identifying any and all related cases.

7. ATTORNEY/PRO SE PARTY PREPARATION: Attorneys and self-represented litigants who appear at a case management conference **MUST** be prepared on the pending matters in the case, be prepared to make decisions about future progress and conduct of the case, and have authority to make representations to the court and enter into binding agreements concerning motions, issues, and scheduling. If a party is represented by more than 1 attorney, the attorney(s) present at a case management conference must be prepared with all attorneys' availability for future events. (Fla. R. Civ. P. 1.200(j)(3)).

8. CASE MANAGEMENT DEADLINES:

   A. **DEADLINES IN THIS CASE MANAGEMENT ORDER MUST BE STRICTLY ENFORCED UNLESS CHANGED BY COURT ORDER FOR GOOD CAUSE SHOWN. (Fla. R. Civ. P. 1.200(e)(1)).**

   B. Notices of unavailability and/or inability to comply with the deadlines have no effect on the case management deadlines set by this order. If a party is unable to comply with a deadline, including due to the unavailability of hearing time, the party must take action consistent with Florida Rule of Civil Procedure 1.200(e)(1). (Fla. R. Civ. P. 1.200(f)-(g)).

9. CASE MANAGEMENT AND TRIAL DEADLINES:

The following deadlines apply unless otherwise modified by the Court.

	EVENTS	COMPLETION DEADLINE
1.	Service of Complaint	120 days from filing; Service under extension is only by court order.
2.	Resolution of all motions/objections directed to the pleadings *(i.e. to dismiss or strike)*	120 days before Calendar Call (must be set within 10 days of filing to be heard within 60 days)
3.	Pleading Amendments/Adding New Parties	120 days before Calendar Call

4.	Disclosure of Fact Witnesses/Lists	150 days before Calendar Call
5.	Disclosure of Expert Witnesses/Lists	120 days before Calendar Call
6.	Completion of Compulsory Examinations	120 days before Calendar Call
7.	Disclosure of Rebuttal Witnesses/Lists	100 days before Calendar Call
8.	Completion of all Discovery (including expert discovery)	30 days before Calendar Call (must be initiated 90 days before Calendar Call)
9.	Filing of all Dispositive Motions and Motions for Summary Judgment	90 days before Calendar Call
10.	Expert Challenges and Deposition Objections	45 days before Calendar Call (must be filed and heard)
11.	Filing of all Pretrial Motions (including Motions in Limine)	30 days before Calendar Call
12.	Deposition Designations	20 days before Calendar Call
13.	Deadline for Mediation	60 days before Calendar Call

10. WITNESS LISTS:

A. NO LATER THAN ONE HUNDRED AND FIFTY (150) DAYS PRIOR TO CALENDAR CALL:

Fact Witnesses:
Parties must file and serve a list of names and addresses of all fact witnesses who are expected to testify at trial. Each party's fact witness list must include a brief description of the substance and scope of the testimony to be elicited from such witness. Both sides must cooperate in the scheduling of such witness depositions.

B. NO LATER THAN ONE HUNDRED AND TWENTY (120) DAYS PRIOR TO CALENDAR CALL:

Expert Witnesses:

1. At the time of disclosure of all expert witnesses, the parties shall file and serve the names and addresses of all expert witnesses to be called at trial, including their

complete and updated curriculum vitae, and all information regarding expert testimony that is required by Fla. R. Civ. P. 1.280(c)(5). Parties shall furnish opposing counsel with two (2) alternative dates of availability of all expert witnesses for the purpose of taking their deposition. Both parties shall cooperate in the scheduling of expert depositions.

2. The parties shall also provide answers to standard form expert interrogatories pursuant to Fla. R. Civ. P. 1.280(c)(5). All reports or other data compiled by each disclosed expert which is intended to be used by the expert and/or referred to during his/her deposition testimony shall be provided electronically to the opposing party at least 72 hours prior to the date of the scheduled deposition.

C. NO LATER THAN ONE HUNDRED (100) DAYS PRIOR TO CALENDAR CALL:

Rebuttal Witnesses:
Parties must file and serve a list of names and addresses of any rebuttal witnesses within one hundred (100) days prior to Calendar Call.

11. COMPULSORY MEDICAL EVALUATIONS ("CME"):

A. NO LATER THAN ONE HUNDRED AND TWENTY (120) DAYS PRIOR TO CALENDAR CALL:

All CME and other examinations pursuant to Florida Rule of Civil Procedure 1.360 must be completed no later than one hundred and twenty (120) days prior to Calendar Call.

12. DISCOVERY DEADLINES**:**

A. NO LATER THAN NINETY (90) DAYS PRIOR TO CALENDAR CALL:

All final discovery must have been initiated at least ninety (90) days prior to Calendar Call.

B. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

Parties must complete all discovery, including expert discovery in accordance with Florida Rule of Civil Procedure 1.280(c)(5), at least thirty (30) days prior to Calendar Call. Discovery conducted after this time period is strongly disfavored and will only be permitted by order of the Court under exceptional circumstances.

C. ELECTRONICALLY STORED INFORMATION (ESI) DISCOVERY:

ESI discovery procedures are governed by Seventeenth Judicial Circuit Administrative Order 2021-20-Gen, a copy of which is available on the Circuit's webpage (www.17th.flcourts.org).

13. MOTIONS:

A. CONFERRAL PRIOR TO FILING MOTIONS:

Before filing a non-dispositive motion, the movant **MUST** confer with the opposing party in a good-faith effort to resolve the issues raised in the motion **AND** at the end of the motion and above the signature block, the movant **MUST** include a certificate of conferral. (Fla. R. Civ. P. 1.202(a)-(b)). **The parties are expected to confer and attempt to resolve the issues raised in the motion before reserving hearing time**.

The requirements of rule 1.202 do not apply when the movant or the nonmovant is unrepresented by counsel (pro se). (Fla. R. Civ. P. 1.202(c)).

B. NO LATER THAN ONE HUNDRED AND TWENTY (120) DAYS PRIOR TO CALENDAR CALL:

1. Motions to Add a Party or Parties or to Amend the Pleadings: must be filed and set for hearing no later than one hundred and twenty (120) days before Calendar Call absent good cause shown. The deadline shall not conflict with Florida Rule of Civil Procedure 1.190(e), and the motion may be denied if there has been undue delay, bad faith, prejudice to the opposing side, dilatory motive on the part of the moving party or when the amendment would be futile.

2. Motions/Objections Directed to the Pleadings: all objections to the pleadings must be filed and set for hearing no later than one hundred and twenty (120) days before Calendar Call. **The motion/objection MUST be set within ten (10) days of filing of the motion/objection to be heard within sixty (60) days**.

C. NO LATER THAN NINETY (90) DAYS PRIOR TO CALENDAR CALL:

1. Motions for Summary Judgment and other Dispositive Motions: must be filed no later than ninety (90) days before Calendar Call. Motions for summary judgment will not be heard at or after Calendar Call unless approved by the court. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Response to Motion for Summary Judgment: the response and supporting factual position must be served no later than forty (40) days after service of the motion for summary judgment. (Fla. R. Civ. P. 1.510(c)(5)).

D. NO LATER THAN FORTY-FIVE (45) DAYS PRIOR TO CALENDAR CALL:

1. Expert Challenges: motions challenging an expert witness ("Expert Challenges"), must be filed and heard no later than forty-five (45) days before Calendar Call.

2. Deposition Objections: objections raised in depositions expected to be introduced at trial must be filed and heard no later than forty-five (45) days before Calendar Call.

E. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

1. Motions in Limine: must be filed no later than thirty (30) days prior to Calendar Call. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Pretrial Motions: must be filed and heard no later than thirty (30) days prior to Calendar Call. All motions, other than motions in limine, not heard before Calendar Call will be deemed abandoned.

F. NO LATER THAN TWENTY (20) DAYS PRIOR TO CALENDAR CALL:

1. Deposition Designations: no later than twenty (20) days prior to Calendar Call, each party must serve designation of depositions, or portions of depositions, each intends to offer as testimony.

14. JOINT PRETRIAL STIPULATION:

A. NO LATER THAN TEN (10) DAYS PRIOR TO CALENDAR CALL:

1. The Joint Pretrial Stipulation contemplates a single document that must be filed and served, **with a courtesy copy served on the undersigned judge**, no later than ten (10) days prior to Calendar Call.

2. The Joint Pretrial Stipulation requires that all agreed matters be fully identified and any disputed matters be specifically delineated with respect to each party.

B. THE JOINT PRETRIAL STIPULATION MUST CONTAIN THE FOLLOWING IN SEPARATELY NUMBERED PARAGRAPHS:

1. Statement of the Facts: A concise, impartial statement of the facts of the case.
2. Stipulated Facts: A list of those facts that can be stipulated and require no proof at trial.
3. Statement of Disputed Law and Fact: A concise, impartial statement of those issues of law and fact that are to be tried.
4. Exhibit Lists: Each party must separately list all exhibits they intend to introduce into evidence. Each item must be listed by number and description on a separate schedule attached to the Joint Pretrial Stipulation. Each exhibit must be specifically described. **Generic descriptions of exhibits are subject to being stricken.** If any party objects to the introduction of any such exhibit, such objection **must be stated in the Joint Pretrial Stipulation**, setting forth the grounds with specificity. All exhibits must have been made available to all parties for examination no later than ten (10) days before Calendar Call. Parties must initial each other's exhibit lists and exhibits. **At trial, only those exhibits properly listed and initialed may be offered into evidence**.

5. Demonstrative Exhibits: all demonstrative exhibits (e.g., charts, graphs, enlargements of exhibits, etc.) intended to be used at a jury trial must be displayed to all parties at least ten (10) days before Calendar Call. **Objections to a demonstrative exhibit must be disclosed in the pretrial stipulation or will be deemed waived.**
6. Witness Lists: Parties must furnish a written list containing the names and addresses of all witnesses intended to be called at trial in alphabetical order. Such list must designate the type of witness ("expert," "rebuttal," "impeachment," or otherwise) and must be attached to the Joint Pretrial Stipulation. All fact witness lists must include a brief description of **the substance and scope of the testimony** to be elicited from such witness. All expert witness lists must **designate the expert's specialties**. If any party objects to any witness, such objection must be stated in the Joint Pretrial Stipulation, setting forth the grounds with specificity. **At trial, only those witnesses properly and timely disclosed will be permitted to testify**.
7. Jury Instructions: If the trial is a jury trial, the parties must identify all agreed upon standard instructions and all special instructions. Copies of all agreed upon jury instructions and disputed jury instructions must be attached to the Joint Pretrial Stipulation identifying the party that proposed the instruction, along with copies of supporting statutory citations and/or case law.
8. Verdict Forms: If the trial is a jury trial, the jury verdict form must be designated as "agreed to" or "disputed" and must be attached to the Joint Pretrial Stipulation.
9. Peremptory Challenges: If the trial is a jury trial, the number of peremptory challenges for each party must be stated and attached to the Joint Pretrial Stipulation.
10. Pending Motions: Parties must set forth a list of all pending motions with copies attached to the Joint Pretrial Stipulation.
11. Trial Estimate: Each party must provide an estimate of the number of trial days required for presenting its side of the case.
12. Expert Challenges: All motions challenging an expert witness must be filed and heard no later than forty-five (45) days before Calendar Call. FAILURE TO DO SO MAY CONSTITUTE A WAIVER OF ANY EXPERT RELATED EVIDENCE ISSUE(S). It is within the discretion of the Court to remove any case with pending expert issues.

15. COURT POLICIES**:**

A. Parties must do all things reasonable and necessary to assure the availability of witnesses for the entire Trial Period or to otherwise preserve witness testimony for trial as provided by the Florida Rules of Civil Procedure. *See* Fla. R. Civ. P. 1.300 & 1.460; *see also* Fla. R. Gen. Prac. & Jud. Admin. 2.545.

B. The requirements of this Order cannot be waived by stipulation **absent prior approval from the Court** pursuant to written agreement between the parties.

C. This Order may be tailored by the assigned Division Judge to conform to the particular requirements of the residential foreclosure and complex litigation divisions.

D. At trial, there will only be one (1) official record transcribed by one (1) court reporter. Plaintiff is responsible for arranging for a court reporter unless otherwise agreed to by

the parties. If a conflict exists, the parties must resolve it among themselves prior to Calendar Call.

16. TRIAL CONTINUANCES**:**

A. The parties must satisfy the requirements of Rule 1.460 to change the trial period.

B. A motion to continue is disfavored and will rarely be granted. No continuances will be granted without Court Order upon written motion setting forth good cause pursuant to In re: Amend. to Fla. R. Civ. P., No. SC23-0962 (December 5, 2024), Fla. R. Civ. P. 1.460, and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e). All motions seeking a continuance must comply with Fla. R. Civ. P. 1.460 and Fla. R. Gen. Prac. & Jud. Admin. 2.545.

C. A motion to continue trial must be in writing unless made at trial and, except for good cause shown, must be signed by the named party requesting the continuance. The motion must be filed promptly after the appearance of good cause to support such motion. Failure to properly request a continuance may be a basis for denying the motion to continue. (Fla. R. Civ. P. 1.460(b)-(c) and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e)).

D. All motions for continuance, even if agreed, must state with specificity as set forth in rule 1.460(d).

E. **NO** CONTINUANCES will be granted based on the lack of due diligence in preparing for trial.

F. **NO** CONTINUANCES will be granted for reasons that should have been readily apparent to the parties when this Order was issued.

G. **NO** CONTINUANCES will be granted if expert witnesses are unavailable because testimony may be preserved by deposition.

H. **NO** CONTINUANCES will be granted for reasons relating to the failure to follow this Order.

I. If a continuance is granted based on the dilatory conduct of an attorney or named party, the court may consider imposing sanctions on the attorney, the party, or both.

17. MEDIATION:

A. Mandatory Mediation: must commence no later than sixty (60) days prior to Calendar Call. The parties must comply with Florida Rules of Civil Procedure 1.700, 1.710, 1.720, and 1.730 as to the conduct of mediation. The parties may attend mediation through the use of communication technology (remotely) if mutually agreed upon. The Court will resolve any disagreement as to where or how mediation is to be conducted. Plaintiff's counsel is appointed lead counsel to facilitate and schedule the settlement conference with the mediator and all parties.

The Court appoints: _____ as Mediator, unless, within thirty (30) days of service of initial process on the last defendant or thirty (30) days from the date of this Order, whichever occurs later, the parties choose a different Mediator, and file notice of that choice and the name of the substitute mediator with the Clerk of Court. Failure to attend mediation may result in sanctions.

18. SANCTIONS: All parties should be familiar with Florida Rule of Civil Procedure 1.380 entitled "Failure to Make Discovery; Sanctions" and section 57.105, Florida Statutes, entitled "Attorney's fee; sanctions for raising unsupported claims or defenses; exceptions; service of motions; damages for delay of litigation."

    FAILURE TO APPEAR, FAILURE TO FOLLOW TIME REQUIREMENTS, OR FAILURE TO FILE DOCUMENTS REQUIRED BY THIS COURT MAY RESULT IN THE DISMISSAL OF THE ACTION OR THE IMPOSITION OF SANCTIONS INCLUDING THE STRIKING OF PLEADINGS.

19. SETTLEMENT NOTIFICATION: Parties must immediately notify the Court in the event of settlement and submit a stipulation for an Order of Dismissal. Parties shall also cancel any and all pending hearings as a result of the settlement.

20. COMPLIANCE WITH DIVISIONAL PROCEDURES: Attorneys and self-represented litigants are required to read and comply with the division's procedures located on the 17th Judicial Circuit Court's Website (www.17th.flcourts.org). Failure to do so may result in appropriate sanctions, as permitted by law.

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____
CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "C"

UNIFORM TRIAL ORDER/SETTING CASE FOR TRIAL (CIRCUIT CIVIL GENERAL TRACK)

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE UNIFORM TRIAL DATE LISTED HEREIN IS A **FIRM** TRIAL DATE AND DEADLINES **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND CALENDAR CALL MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND.

THIS UNIFORM TRIAL ORDER SUPERSEDES ANY PRIOR UNIFORM TRIAL ORDER ENTERED IN THIS CASE.

TRIAL PERIOD COMMENCING: _____.

CALENDAR CALL: _____.

I. ORDER OF TRIALS:

Parties are subject to being called to commence trial during any portion of the above noted Trial Period, unless otherwise ordered by the Court.

II. TRIAL DATE:

The Court has determined this case is ready for trial pursuant to Florida Rule of Civil Procedure 1.440. This case is set for trial before the undersigned Judge in Courtroom _____ , Broward County Courthouse, 201 S.E. 6th Street, Fort Lauderdale, Florida, 33301, as stated above.

III. CIVIL TRIAL POOL:

Parties are advised that this case may be placed into the Seventeenth Judicial Circuit Court's "Civil Trial Pool" and is subject to being called for trial before any judge. If placed in the Civil Trial Pool, **parties must be prepared to proceed to trial if called.** Only the Division Judge or the Administrative Judge of the Seventeenth Judicial Circuit Court's Civil Division may grant a continuance of any case placed in the Civil Trial Pool.

IV. TRIAL CONTINUANCES:

A. The parties must satisfy the requirements of Rule 1.460 to change the trial period.

B. A motion to continue is disfavored and will rarely be granted. No continuances will be granted without Court Order upon written motion setting forth good cause pursuant to In re: Amend. to Fla. R. Civ. P., No. SC23-0962 (December 5, 2024), Fla. R. Civ. P. 1.460, and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e). All motions seeking a continuance must comply with Fla. R. Civ. P. 1.460 and Fla. R. Gen. Prac. & Jud. Admin. 2.545.

C. A motion to continue trial must be in writing unless made at trial and, except for good cause shown, must be signed by the named party requesting the continuance. The motion must be filed promptly after the appearance of good cause to support such motion. Failure to properly request a continuance may be a basis for denying the motion to continue. (Fla. R. Civ. P. 1.460(b)-(c) and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e)).

D. All motions for continuance, even if agreed, must state with specificity as set forth in rule 1.460(d).

E. **NO** CONTINUANCES will be granted based on the lack of due diligence in preparing for trial.

F. **NO** CONTINUANCES will be granted for reasons that should have been readily apparent to the parties when this Order was issued.

G. **NO** CONTINUANCES will be granted if expert witnesses are unavailable because testimony may be preserved by deposition.

H. **NO** CONTINUANCES will be granted for reasons relating to the failure to follow this Order.

I. If a continuance is granted based on the dilatory conduct of an attorney or named party, the court may consider imposing sanctions on the attorney, the party, or both.

V. <u>COMPLIANCE WITH THE CASE MANAGEMENT ORDER</u>:

Parties are required to strictly comply and adhere to the deadlines and requirements set forth in the Case Management Order. Strict compliance of the Case Management Order and the Uniform Trial Order is **<u>MANDATORY</u>**. Failure to comply may result in appropriate sanctions, including, but not limited to, dismissal of the action or striking of pleadings, or any other sanctions as permitted by law. (Fla. R. Civ. P. 1.200(j)(6)).

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____

CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "D"

INITIAL CASE MANAGEMENT ORDER
(CIRCUIT CIVIL COMPLEX BUSINESS TRACK)

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE DEADLINES LISTED HEREIN **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.201, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND THE MANDATORY INITIAL CASE MANAGEMENT CONFERENCE MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND.

1. **Your case is**:
   Complex: Projected date of Trial within 30 months from the date of service of initial process on the last defendant or 120 days after commencement of the action as provided in rule 1.050, whichever occurs first.

2. The **MANDATORY** Initial Case Management Conference will be held on zoom (_____) or in Courtroom _____ on _____at _____am/pm.

   Lead trial counsel and a client representative **MUST** attend the **MANDATORY** Initial Case Management Conference. (Fla. R. Civ. P. 1.201(b)(2)).

   During the case management conference, the Court may elect to hear any pending motion, even if the parties have not identified the motion as an issue to be resolved. Motions for summary judgment and matters requiring an evidentiary hearing may not be heard unless agreed to by the parties and the court. (Fla. R. Civ. P. 1.200(j)(2)).

   On any matters ruled upon, unless otherwise ordered, within five (5) days following the Case Management Conference, counsel for Plaintiff(s) shall prepare an order pursuant to Florida Rule of Civil Procedure 1.200(j)(5).

3. **COMPLAINT**: The Complaint shall be served within 120 days of filing. Failure to perfect service within 120 days shall subject the action to dismissal without prejudice or dropping of that party as a defendant. If plaintiff shows good cause or excusable neglect for failure to serve within 120 days, the court shall extend the time for service for an appropriate period. (Fla. R. Civ. P. 1.070(j)).

4. **NOTICE OF SERVICE OF COMPLAINT**: Upon service of the complaint on the last of all named defendants in a civil action, the plaintiff will file a Notice of Service and

provide a courtesy copy of the Notice of Service to the assigned trial judge. A fillable PDF form "Notice of Service" is available on the Circuit's webpage (www.17th.flcourts.org).

5. **TRIAL**: A Uniform Trial Order Setting Case for Trial will be issued following the Initial Case Management Conference. The Uniform Trial Order will provide dates for the trial period, calendar call, and final case management conference. It is the intention of the Court to set the trial period no sooner than six (6) months and no later than twenty-four (24) months from the date of the conference unless good cause is shown for an earlier or later date. (Fla. R. Civ. P. 1.201(b)(3)). If counsel's clients or expert witnesses have any conflicts, be prepared to discuss that at the time of the conference.

6. **TRIAL CONTINUANCES**: Continuance of the trial of a complex action will rarely be granted and then only upon good cause shown. Any motion for continuation will be governed by Florida Rule of Civil Procedure 1.460. (Fla. R. Civ. P. 1.201(b)(3)).

7. **DISCOVERY DEADLINES**: Deadlines for Witness Lists, Compulsory Medical Examinations, Discovery, Motions, Exhibits Lists, Daubert Challenges, Jury Instructions, and Mediation will be specifically detailed in the Case Management Order/Uniform Trial Order (Setting Case for Trial). Please carefully review the divisions Policies and Procedures to schedule hearings.

8. **INITIAL CASE MANAGEMENT REPORT/JOINT STATEMENT**: At least twenty (20) days prior to the date of the initial case management conference, attorneys for the parties as well as any parties appearing pro se must confer and prepare a joint statement.

   The Joint Statement must be **filed** with the clerk of the court **no later than fourteen (14) days before the conference**, outlining a discovery plan and stating:

   A. a brief factual statement of the action, which includes the claims and defenses;
   B. a brief statement on the theory of damages by any party seeking affirmative relief;
   C. the likelihood of settlement;
   D. the likelihood of appearance in the action of additional parties and identification of any nonparties to whom any of the parties will seek to allocate fault;
   E. the proposed limits on the time:
      i. to join other parties and to amend the pleadings;
      ii. to file and hear motions;
      iii. to identify any nonparties whose identity is known, or otherwise describe as specifically as practicable any nonparties whose identity is not known;
      iv. to disclose expert witnesses; and
      v. to complete discovery;
   F. the names of the attorneys responsible for handling the action;
   G. the necessity for a protective order to facilitate discovery;
   H. proposals for the formulation and simplification of issues, including the elimination of frivolous claims or defenses, and the number and timing of motions for summary judgment or partial summary judgment;
   I. the possibility of obtaining admissions of fact and voluntary exchange of documents and electronically stored information, stipulations regarding authenticity of documents, electronically stored information, and the need for advance rulings from the court on admissibility of evidence;

J. the possibility of obtaining agreements among the parties regarding the extent to which such electronically stored information should be preserved, the form in which such information should be produced, and whether discovery of such information should be conducted in phases or limited to particular individuals, time periods, or sources;
K. suggestions on the advisability and timing of referring matters to a magistrate, master, other neutral, or mediation;
L. a preliminary estimate of the time required for trial;
M. requested date or dates for conferences before trial, a final pretrial conference, and trial;
N. a description of pertinent documents and a list of fact witnesses the parties believe to be relevant;
O. number of experts and fields of expertise; and
P. any other information that might be helpful to the court in setting further conferences and the trial period, including, but not limited to:
    i. Number of parties; number of peremptory challenges.
    ii. Future Case Management Conferences;
    iii. A statement of any efforts to date to resolve the case, including mediation or arbitration. Be prepared to discuss names of mediators or arbitrators who counsel can agree to in the event the court orders mediation or arbitration. A list of at least five (5) certified mediators who are acceptable for mediation.
    iv. Any special matters that the parties would like to bring to the attention of the court.

This hearing may be canceled only if the action is settled and a final order of dismissal is issued or if the action is dismissed. All counsel have the responsibility of immediately informing the court of a settlement of the case.

COMPLIANCE WITH THIS ORDER IS MANDATORY IN ORDER TO ENABLE THE COURT TO ADEQUATELY MANAGE THE DOCKET. FAILURE TO FOLLOW THIS ORDER IN ANY RESPECT MAY RESULT IN THE IMPOSITION OF SANCTIONS.

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____

CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "E"

UNIFORM TRIAL ORDER SETTING CASE FOR TRIAL
COMPLEX BUSINESS DIVISION

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE DEADLINES LISTED HEREIN **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.201, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND THE FINAL CASE MANAGEMENT CONFERENCE OR CALENDAR CALL MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND.

THIS UNIFORM TRIAL ORDER/CASE MANAGEMENT ORDER SUPERSEDES ANY PRIOR UNIFORM TRIAL ORDER/CASE MANAGEMENT ORDER ENTERED IN THIS CASE.

This case has been designated to the **COMPLEX BUSINESS CIVIL TRACK**. The deadlines established by this Order are to ensure the case is disposed of within 30 months from the date of service of initial process on the last defendant or 120 days after commencement of the action as provided in rule 1.050, whichever occurs first. Accordingly, the following procedures and deadlines shall be strictly observed by the parties and enforced by the court:

TRIAL PERIOD COMMENCING: _____.

CALENDAR CALL: _____.

FINAL CASE MANAGEMENT CONFERENCE: _____.

I. ORDER OF TRIALS:
Parties are subject to being called to commence trial during any portion of the above noted Trial Period, unless otherwise ordered by the Court.

II. TRIAL DATE:
The Court has determined this case is ready for trial pursuant to Florida Rule of Civil Procedure 1.440. This case is set for trial before the undersigned Judge in Courtroom _____ , Broward County Courthouse, 201 S.E. 6th Street, Fort Lauderdale, Florida, 33301, as stated above.

III. CIVIL TRIAL POOL:
Parties are advised that this case may be placed into the Seventeenth Judicial Circuit Court's "Civil Trial Pool" and is subject to being called for trial before any judge. If placed in the Civil Trial Pool, **parties must be prepared to proceed to trial if called.** Only the Division Judge or the Administrative Judge of the Seventeenth Judicial Circuit Court's Civil Division may grant a continuance of any case placed in the Civil Trial Pool.

IV. COMPLAINT: The Complaint shall be served within 120 days of filing. Failure to perfect service within 120 days shall subject the action to dismissal without prejudice or dropping of that party as a defendant. If plaintiff shows good cause or excusable neglect for failure to serve within 120 days, the court shall extend the time for service for an appropriate period. (Fla. R. Civ. P. 1.070(j)).

V. NOTICE OF SERVICE OF COMPLAINT: Upon service of the complaint on the last of all named defendants in a civil action, the plaintiff will file a Notice of Service and provide a courtesy copy of the Notice of Service to the assigned trial judge. A fillable PDF form "Notice of Service" is available on the Circuit's webpage (www.17th.flcourts.org).

VI. NOTICE OF RELATED CASE(S) (i.e., cases involving the same parties, same subject matter or incident, or same property at issue): The Parties shall file a Notice of Related Case(s) within thirty (30) days from the date of this Order identifying any and all related cases.

VII. MANDATORY FINAL CASE MANAGEMENT CONFERENCE:

A. A Final Case Management Conference will be set not less than ninety (90) days before the date the case is set for trial.

B. At least ten (10) days before the final case management conference the parties must confer to prepare a case status report, which must be filed with the clerk of the court either before or at the time of the final case management conference. The status report must contain in separately numbered paragraphs the items set forth in Fla. R. Civ. P. 1.201(d).

VIII. CASE MANAGEMENT HEARINGS:

A. The Court shall schedule periodic case management conferences and hearings on lengthy motions at reasonable intervals based on the particular needs of the action. In addition to the conferral required under rule 1.202, the parties must confer no later than 15 days prior to each case management conference or hearing. Parties must notify the court immediately if a case management conference or hearing time becomes unnecessary. Failure to timely notify the court that a case management conference or hearing time is unnecessary may result in sanctions. (Fla. R. Civ. P. 1.201(c)(4)).

IX. INITIAL DISCOVERY DISCLOSURES:

A. Parties must make initial discovery disclosures required by Florida Rule of Civil Procedure 1.280 **within 60 days after the service of the complaint or joinder**, unless a different time is set by court order. Pursuant to Local Rule 10A, a party may file a

motion for ex parte relief where no motion for extension of time has been filed and the nonmoving party has completely failed to comply with Florida Rule of Civil Procedure 1.280(a).

B. A party may not seek discovery from any source before that party's initial disclosures are served on the other party, except when authorized by stipulation or by court order. (Fla. R. Civ. P. 1.280(f)(1)).

C. As set forth in Rule 1.280(a)(1), initial discovery disclosures include:
   1. The name and, if known, the address, telephone number, and e-mail address of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;
   2. A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control (or, if not in the disclosing party's possession, custody, or control, a description by category and location of such information) and may use to support its claims or defenses, unless the use would be solely for impeachment;
   3. A computation for each category of damages claimed by the disclosing party and a copy of the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; provided that a party is not required to provide computations as to noneconomic damages, but the party must identify categories of damages claimed and provide supporting documents; and
   4. A copy of any insurance policy or agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

D. A party who has made a disclosure under this rule or who has responded to an interrogatory, a request for production, or a request for admission **must** supplement or correct its disclosure or response: (a) in a timely manner if the party learns that in some material respect the disclosure or response is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing; or (b) as ordered by the court. (Fla. R. Civ. P. 1.280(g)).

X. CASE MANAGEMENT AND TRIAL DEADLINES:

The following deadlines apply unless otherwise modified by the Court.

	EVENTS	COMPLETION DEADLINE
1.	Service of Complaint	120 days from filing; Service under extension is only by court order.

2.	Resolution of all motions/objections directed to the pleadings *(i.e. to dismiss or strike)*	120 days before Calendar Call (must be set within 10 days of filing to be heard within 60 days)
3.	Pleading Amendments/Adding New Parties	150 days before Calendar Call
4.	Disclosure of Fact Witnesses/Lists	150 days before Calendar Call
5.	Disclosure of Expert Witnesses/Lists	150 days before Calendar Call
6.	Completion of Compulsory Examinations	120 days before Calendar Call
7.	Disclosure of Rebuttal Witnesses/Lists	100 days before Calendar Call
8.	Completion of all Discovery (including expert discovery)	30 days before Calendar Call (must be initiated 90 days before Calendar Call)
9.	Filing of all Dispositive Motions and Motions for Summary Judgment	90 days before Calendar Call
10.	Expert Challenges and Deposition Objections	45 days before Calendar Call (must be filed and heard)
11.	Filing of all Pretrial Motions (including Motions in Limine)	30 days before Calendar Call
12.	Deposition Designations	20 days before Calendar Call
13.	Deadline for Mediation	60 days before Calendar Call

XI. WITNESS LISTS:

A. NO LATER THAN ONE HUNDRED AND FIFTY (150) DAYS PRIOR TO CALENDAR CALL:

Fact Witnesses:
Parties must file and serve a list of names and addresses of all fact witnesses who are expected to testify at trial. Each party's fact witness list must include a brief description of the substance and scope of the testimony to be elicited from such witness. Both sides must cooperate in the scheduling of such witness depositions.

B. NO LATER THAN ONE HUNDRED AND FIFTY (150) DAYS PRIOR TO CALENDAR CALL:

Expert Witnesses:

1. At the time of disclosure of all expert witnesses, the parties shall file and serve the names and addresses of all expert witnesses to be called at trial, including their complete and updated curriculum vitae, and all information regarding expert testimony that is required by Fla. R. Civ. P. 1.280(c)(5). Parties shall furnish opposing counsel with two (2) alternative dates of availability of all expert witnesses for the purpose of taking their deposition. Both parties shall cooperate in the scheduling of expert depositions.

2. The parties shall also provide answers to standard form expert interrogatories pursuant to Fla. R. Civ. P. 1.280(c)(5). All reports or other data compiled by each disclosed expert which is intended to be used by the expert and/or referred to during his/her deposition testimony shall be provided electronically to the opposing party at least 72 hours prior to the date of the scheduled deposition.

3. If a party has named an expert witness in a field in which any other parties have not identified experts, the other parties may name experts in that field within thirty (30) days thereafter. No additional experts may be named unless good cause is shown. (Fla. R. Civ. P. 1.201(c)(1)).

4. Not more than 10 days after the date set for naming experts, the parties must meet and schedule dates for deposition of experts and all other witnesses not yet deposed. Any party may file the completed discovery deposition schedule agreed on or entered by the court. Once filed, the deposition dates in the schedule may not be altered without consent of all parties or on order of the court. Failure to comply with the discovery schedule may result in sanctions in accordance with Rule 1.380. (Fla. R. Civ. P. 1.201(c)(2)).

C. NO LATER THAN ONE HUNDRED (100) DAYS PRIOR TO CALENDAR CALL:

Rebuttal Witnesses:
Parties must file and serve a list of names and addresses of any rebuttal witnesses within one hundred (100) days prior to Calendar Call.

XII. COMPULSORY MEDICAL EVALUATIONS ("CME"):

A. NO LATER THAN ONE HUNDRED AND TWENTY (120) DAYS PRIOR TO CALENDAR CALL:

All CME and other examinations pursuant to Florida Rule of Civil Procedure 1.360 must be completed no later than one hundred and twenty (120) days prior to Calendar Call.

XIII. DISCOVERY DEADLINES**:**

A. NO LATER THAN NINETY (90) DAYS PRIOR TO CALENDAR CALL:

All final discovery must have been initiated at least ninety (90) days prior to Calendar Call.

B. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

Parties must complete all discovery, including expert discovery in accordance with Florida Rule of Civil Procedure 1.280(c)(5), at least thirty (30) days prior to Calendar Call. Discovery conducted after this time period is strongly disfavored and will only be permitted by order of the Court under exceptional circumstances.

C. ELECTRONICALLY STORED INFORMATION (ESI) DISCOVERY:

ESI discovery procedures are governed by Seventeenth Judicial Circuit Administrative Order 2021-20-Gen, a copy of which is available on the Circuit's webpage (www.17th.flcourts.org).

XIV. MOTIONS:

A. CONFERRAL PRIOR TO FILING MOTIONS:

Before filing a non-dispositive motion, the movant **MUST** confer with the opposing party in a good-faith effort to resolve the issues raised in the motion **AND** at the end of the motion and above the signature block, the movant **MUST** include a certificate of conferral. (Fla. R. Civ. P. 1.202(a)-(b)). **The parties are expected to confer and attempt to resolve the issues raised in the motion before reserving hearing time**.

The requirements of rule 1.202 do not apply when the movant or the nonmovant is unrepresented by counsel (pro se). (Fla. R. Civ. P. 1.202(c)).

B. NO LATER THAN ONE HUNDRED AND FIFTY (150) DAYS PRIOR TO CALENDAR CALL:

1. Motions to Add a Party or Parties or to Amend the Pleadings: must be filed and set for hearing no later than one hundred and fifty (150) days before Calendar Call absent good cause shown. The deadline shall not conflict with Florida Rule of Civil Procedure 1.190(e), and the motion may be denied if there has been undue delay, bad faith, prejudice to the opposing side, dilatory motive on the part of the moving party or when the amendment would be futile.

C. NO LATER THAN ONE HUNDRED AND TWENTY (120) DAYS PRIOR TO CALENDAR CALL:

1. Motions/Objections Directed to the Pleadings: all objections to the pleadings must be filed and set for hearing no later than one hundred and twenty (120) days before Calendar Call. **The motion/objection MUST be set within ten (10) days of filing of the motion/objection to be heard within sixty (60) days**.

D. NO LATER THAN NINETY (90) DAYS PRIOR TO CALENDAR CALL:

1. Motions for Summary Judgment and other Dispositive Motions: must be filed no later than ninety (90) days before Calendar Call. Motions for summary judgment will not be heard at or after Calendar Call unless approved by the court. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Response to Motion for Summary Judgment: the response and supporting factual position must be served no later than forty (40) days after service of the motion for summary judgment. (Fla. R. Civ. P. 1.510(c)(5)).

E. NO LATER THAN FORTY-FIVE (45) DAYS PRIOR TO CALENDAR CALL:

1. Expert Challenges: motions challenging an expert witness ("Expert Challenges"), must be filed and heard no later than forty-five (45) days before Calendar Call.

2. Deposition Objections: objections raised in depositions expected to be introduced at trial must be filed and heard no later than forty-five (45) days before Calendar Call.

F. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

1. Motions in Limine: must be filed no later than thirty (30) days prior to Calendar Call. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Pretrial Motions: must be filed and heard no later than thirty (30) days prior to Calendar Call. All motions, other than motions in limine, not heard before Calendar Call will be deemed abandoned.

G. NO LATER THAN TWENTY (20) DAYS PRIOR TO CALENDAR CALL:

1. Deposition Designations: no later than twenty (20) days prior to Calendar Call, each party must serve designation of depositions, or portions of depositions, each intends to offer as testimony.

XV. JOINT PRETRIAL STIPULATION:

A. NO LATER THAN TEN (10) DAYS PRIOR TO CALENDAR CALL:

1. The Joint Pretrial Stipulation contemplates a single document that must be filed and served, **with a courtesy copy served on the undersigned judge**, no later than ten (10) days prior to Calendar Call.

2. The Joint Pretrial Stipulation requires that all agreed matters be fully identified and any disputed matters be specifically delineated with respect to each party.

B. THE JOINT PRETRIAL STIPULATION MUST CONTAIN THE FOLLOWING IN SEPARATELY NUMBERED PARAGRAPHS:

1. Statement of the Facts: A concise, impartial statement of the facts of the case.
2. Stipulated Facts: A list of those facts that can be stipulated and require no proof at trial.
3. Statement of Disputed Law and Fact: A concise, impartial statement of those issues of law and fact that are to be tried.
4. Exhibit Lists: Each party must separately list all exhibits they intend to introduce into evidence. Each item must be listed by number and description on a separate schedule attached to the Joint Pretrial Stipulation. Each exhibit must be specifically described. **Generic descriptions of exhibits are subject to being stricken.** If any party objects to the introduction of any such exhibit, such objection **must be stated in the Joint Pretrial Stipulation**, setting forth the grounds with specificity. All exhibits must have been made available to all parties for examination no later than ten (10) days before Calendar Call. Parties must initial each other's exhibit lists and exhibits. **At trial, only those exhibits properly listed and initialed may be offered into evidence**.
5. Demonstrative Exhibits: all demonstrative exhibits (e.g., charts, graphs, enlargements of exhibits, etc.) intended to be used at a jury trial must be displayed to all parties at least ten (10) days before Calendar Call. **Objections to a demonstrative exhibit must be disclosed in the pretrial stipulation or will be deemed waived.**
6. Witness Lists: Parties must furnish a written list containing the names and addresses of all witnesses intended to be called at trial in alphabetical order. Such list must designate the type of witness ("expert," "rebuttal," "impeachment," or otherwise) and must be attached to the Joint Pretrial Stipulation. All fact witness lists must include a brief description of **the substance and scope of the testimony** to be elicited from such witness. All expert witness lists must **designate the expert's specialties**. If any party objects to any witness, such objection must be stated in the Joint Pretrial Stipulation, setting forth the grounds with specificity. **At trial, only those witnesses properly and timely disclosed will be permitted to testify**.
7. Jury Instructions: If the trial is a jury trial, the parties must identify all agreed upon standard instructions and all special instructions. Copies of all agreed upon jury instructions and disputed jury instructions must be attached to the Joint Pretrial Stipulation identifying the party that proposed the instruction, along with copies of supporting statutory citations and/or case law.
8. Verdict Forms: If the trial is a jury trial, the jury verdict form must be designated as "agreed to" or "disputed" and must be attached to the Joint Pretrial Stipulation.
9. Peremptory Challenges: If the trial is a jury trial, the number of peremptory challenges for each party must be stated and attached to the Joint Pretrial Stipulation.

10. Pending Motions: Parties must set forth a list of all pending motions with copies attached to the Joint Pretrial Stipulation.
11. Trial Estimate: Each party must provide an estimate of the number of trial days required for presenting its side of the case.
12. Expert Challenges: All motions challenging an expert witness must be filed and heard no later than forty-five (45) days before Calendar Call. FAILURE TO DO SO MAY CONSTITUTE A WAIVER OF ANY EXPERT RELATED EVIDENCE ISSUE(S). It is within the discretion of the Court to remove any case with pending expert issues.

XVI. COURT POLICIES**:**

A. Parties must do all things reasonable and necessary to assure the availability of witnesses for the entire Trial Period or to otherwise preserve witness testimony for trial as provided by the Florida Rules of Civil Procedure. *See* Fla. R. Civ. P. 1.300 & 1.460; *see also* Fla. R. Gen. Prac. & Jud. Admin. 2.545.

B. The requirements of this Order cannot be waived by stipulation **absent prior approval from the Court** pursuant to written agreement between the parties.

C. At trial, there will only be one (1) official record transcribed by one (1) court reporter. Plaintiff is responsible for arranging for a court reporter unless otherwise agreed to by the parties. If a conflict exists, the parties must resolve it among themselves prior to Calendar Call.

XVII. TRIAL CONTINUANCES**:**

A. The parties must satisfy the requirements of Rule 1.460 to change the trial period.

B. Continuance of the trial of a complex action will rarely be granted and then only upon good cause shown. Any motion for continuation will be governed by Florida Rule of Civil Procedure 1.460. (Fla. R. Civ. P. 1.201(b)(3)).

C. No continuances will be granted without Court Order upon written motion setting forth good cause pursuant to In re: Amend. to Fla. R. Civ. P., No. SC23-0962 (December 5, 2024), Fla. R. Civ. P. 1.460, and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e). All motions seeking a continuance must comply with Fla. R. Civ. P. 1.460 and Fla. R. Gen. Prac. & Jud. Admin. 2.545.

D. A motion to continue trial must be in writing unless made at trial and, except for good cause shown, must be signed by the named party requesting the continuance. The motion must be filed promptly after the appearance of good cause to support such motion. Failure to properly request a continuance may be a basis for denying the motion to continue. (Fla. R. Civ. P. 1.460(b)-(c) and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e)).

E. All motions for continuance, even if agreed, must state with specificity as set forth in rule 1.460(d).

F. **NO** CONTINUANCES will be granted based on the lack of due diligence in preparing for trial.

G. **NO** CONTINUANCES will be granted for reasons that should have been readily apparent to the parties when this Order was issued.

H. **NO** CONTINUANCES will be granted if expert witnesses are unavailable because testimony may be preserved by deposition.

I. **NO** CONTINUANCES will be granted for reasons relating to the failure to follow this Order.

J. If a continuance is granted based on the dilatory conduct of an attorney or named party, the court may consider imposing sanctions on the attorney, the party, or both.

XVIII. MEDIATION:

A. Mandatory Mediation: must commence no later than sixty (60) days prior to Calendar Call. The parties must comply with Florida Rules of Civil Procedure 1.700, 1.710, 1.720, and 1.730 as to the conduct of mediation. The parties may attend mediation through the use of communication technology (remotely) if mutually agreed upon. The Court will resolve any disagreement as to where or how mediation is to be conducted. Plaintiff's counsel is appointed lead counsel to facilitate and schedule the settlement conference with the mediator and all parties.

The Court appoints: _____ as Mediator, unless, within thirty (30) days of service of initial process on the last defendant or thirty (30) days from the date of this Order, whichever occurs later, the parties choose a different Mediator, and file notice of that choice and the name of the substitute mediator with the Clerk of Court. Failure to attend mediation may result in sanctions.

XIX. SANCTIONS: All parties should be familiar with Florida Rule of Civil Procedure 1.380 entitled "Failure to Make Discovery; Sanctions" and section 57.105, Florida Statutes, entitled "Attorney's fee; sanctions for raising unsupported claims or defenses; exceptions; service of motions; damages for delay of litigation."

FAILURE TO APPEAR, FAILURE TO FOLLOW TIME REQUIREMENTS, OR FAILURE TO FILE DOCUMENTS REQUIRED BY THIS COURT MAY RESULT IN THE DISMISSAL OF THE ACTION OR THE IMPOSITION OF SANCTIONS INCLUDING THE STRIKING OF PLEADINGS.

XX. SETTLEMENT NOTIFICATION: Parties must immediately notify the Court in the event of settlement and submit a stipulation for an Order of Dismissal. Parties shall also cancel any and all pending hearings as a result of the settlement.

XXI. COMPLIANCE WITH DIVISIONAL PROCEDURES: Attorneys and self-represented litigants are required to read and comply with the division's procedures located on the 17th Judicial Circuit Court's Website (www.17th.flcourts.org). Failure to do so may result in appropriate sanctions, as permitted by law.

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____

CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "F"

INITIAL CASE MANAGEMENT ORDER
(CIRCUIT CIVIL COMPLEX TORT TRACK)

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE DEADLINES LISTED HEREIN **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.201, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND THE MANDATORY INITIAL CASE MANAGEMENT CONFERENCE MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND.

1. **Your case is**:
   Complex: Projected date of Trial within 30 months from the date of service of initial process on the last defendant or 120 days after commencement of the action as provided in rule 1.050, whichever occurs first.

2. The **MANDATORY** Initial Case Management Conference will be held on zoom (_____) or in Courtroom _____ on _____at _____am/pm.

   Lead trial counsel and a client representative **MUST** attend the **MANDATORY** Initial Case Management Conference. (Fla. R. Civ. P. 1.201(b)(2)).

   During the case management conference, the Court may elect to hear any pending motion, even if the parties have not identified the motion as an issue to be resolved. Motions for summary judgment and matters requiring an evidentiary hearing may not be heard unless agreed to by the parties and the court. (Fla. R. Civ. P. 1.200(j)(2)).

   On any matters ruled upon, unless otherwise ordered, within five (5) days following the Case Management Conference, counsel for Plaintiff(s) shall prepare an order pursuant to Florida Rule of Civil Procedure 1.200(j)(5).

3. **COMPLAINT**: The Complaint shall be served within 120 days of filing. Failure to perfect service within 120 days shall subject the action to dismissal without prejudice or dropping of that party as a defendant. If plaintiff shows good cause or excusable neglect for failure to serve within 120 days, the court shall extend the time for service for an appropriate period. (Fla. R. Civ. P. 1.070(j)).

4. **NOTICE OF SERVICE OF COMPLAINT**: Upon service of the complaint on the last of all named defendants in a civil action, the plaintiff will file a Notice of Service and

provide a courtesy copy of the Notice of Service to the assigned trial judge. A fillable PDF form "Notice of Service" is available on the Circuit's webpage (www.17th.flcourts.org).

5. **TRIAL**: A Uniform Trial Order Setting Case for Trial will be issued following the Initial Case Management Conference. The Uniform Trial Order will provide dates for the trial period, calendar call, and final case management conference. It is the intention of the Court to set the trial period no sooner than six (6) months and no later than twenty-four (24) months from the date of the conference unless good cause is shown for an earlier or later date. (Fla. R. Civ. P. 1.201(b)(3)). If counsel's clients or expert witnesses have any conflicts, be prepared to discuss that at the time of the conference.

6. **TRIAL CONTINUANCES**: Continuance of the trial of a complex action will rarely be granted and then only upon good cause shown. Any motion for continuation will be governed by Florida Rule of Civil Procedure 1.460. (Fla. R. Civ. P. 1.201(b)(3)).

7. **DISCOVERY DEADLINES**: Deadlines for Witness Lists, Compulsory Medical Examinations, Discovery, Motions, Exhibits Lists, Daubert Challenges, Jury Instructions, and Mediation will be specifically detailed in the Case Management Order/Uniform Trial Order (Setting Case for Trial). Please carefully review the divisions Policies and Procedures to schedule hearings.

8. **INITIAL CASE MANAGEMENT REPORT/JOINT STATEMENT**: At least twenty (20) days prior to the date of the initial case management conference, attorneys for the parties as well as any parties appearing pro se must confer and prepare a joint statement.

   The Joint Statement must be **filed** with the clerk of the court **no later than fourteen (14) days before the conference**, outlining a discovery plan and stating:

   A. a brief factual statement of the action, which includes the claims and defenses;
   B. a brief statement on the theory of damages by any party seeking affirmative relief;
   C. the likelihood of settlement;
   D. the likelihood of appearance in the action of additional parties and identification of any nonparties to whom any of the parties will seek to allocate fault;
   E. the proposed limits on the time:
      i. to join other parties and to amend the pleadings;
      ii. to file and hear motions;
      iii. to identify any nonparties whose identity is known, or otherwise describe as specifically as practicable any nonparties whose identity is not known;
      iv. to disclose expert witnesses; and
      v. to complete discovery;
   F. the names of the attorneys responsible for handling the action;
   G. the necessity for a protective order to facilitate discovery;
   H. proposals for the formulation and simplification of issues, including the elimination of frivolous claims or defenses, and the number and timing of motions for summary judgment or partial summary judgment;
   I. the possibility of obtaining admissions of fact and voluntary exchange of documents and electronically stored information, stipulations regarding authenticity of documents, electronically stored information, and the need for advance rulings from the court on admissibility of evidence;

J. the possibility of obtaining agreements among the parties regarding the extent to which such electronically stored information should be preserved, the form in which such information should be produced, and whether discovery of such information should be conducted in phases or limited to particular individuals, time periods, or sources;
K. suggestions on the advisability and timing of referring matters to a magistrate, master, other neutral, or mediation;
L. a preliminary estimate of the time required for trial;
M. requested date or dates for conferences before trial, a final pretrial conference, and trial;
N. a description of pertinent documents and a list of fact witnesses the parties believe to be relevant;
O. number of experts and fields of expertise; and
P. any other information that might be helpful to the court in setting further conferences and the trial period, including, but not limited to:
    i. Number of parties; number of peremptory challenges.
    ii. Future Case Management Conferences;
    iii. A statement of any efforts to date to resolve the case, including mediation or arbitration. Be prepared to discuss names of mediators or arbitrators who counsel can agree to in the event the court orders mediation or arbitration. A list of at least five (5) certified mediators who are acceptable for mediation.
    iv. Any special matters that the parties would like to bring to the attention of the court.

This hearing may be canceled only if the action is settled and a final order of dismissal is issued or if the action is dismissed. All counsel have the responsibility of immediately informing the court of a settlement of the case.

COMPLIANCE WITH THIS ORDER IS MANDATORY IN ORDER TO ENABLE THE COURT TO ADEQUATELY MANAGE THE DOCKET. FAILURE TO FOLLOW THIS ORDER IN ANY RESPECT MAY RESULT IN THE IMPOSITION OF SANCTIONS.

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____

CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "G"

UNIFORM TRIAL ORDER SETTING CASE FOR TRIAL
COMPLEX TORT DIVISION

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE DEADLINES LISTED HEREIN **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.201, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND THE FINAL CASE MANAGEMENT CONFERENCE OR CALENDAR CALL MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND.

THIS UNIFORM TRIAL ORDER/CASE MANAGEMENT ORDER SUPERSEDES ANY PRIOR UNIFORM TRIAL ORDER/CASE MANAGEMENT ORDER ENTERED IN THIS CASE.

This case has been designated to the **COMPLEX TORT CIVIL TRACK**. The deadlines established by this Order are to ensure the case is disposed of within 30 months from the date of service of initial process on the last defendant or 120 days after commencement of the action as provided in rule 1.050, whichever occurs first. Accordingly, the following procedures and deadlines shall be strictly observed by the parties and enforced by the court:

TRIAL PERIOD COMMENCING: _____.

CALENDAR CALL: _____.

FINAL CASE MANAGEMENT CONFERENCE: _____.

I. ORDER OF TRIALS:
Parties are subject to being called to commence trial during any portion of the above noted Trial Period, unless otherwise ordered by the Court.

II. TRIAL DATE:
The Court has determined this case is ready for trial pursuant to Florida Rule of Civil Procedure 1.440. This case is set for trial before the undersigned Judge in Courtroom _____ , Broward County Courthouse, 201 S.E. 6th Street, Fort Lauderdale, Florida, 33301, as stated above.

III. CIVIL TRIAL POOL:
Parties are advised that this case may be placed into the Seventeenth Judicial Circuit Court's "Civil Trial Pool" and is subject to being called for trial before any judge. If placed in the Civil Trial Pool, **parties must be prepared to proceed to trial if called.** Only the Division Judge or the Administrative Judge of the Seventeenth Judicial Circuit Court's Civil Division may grant a continuance of any case placed in the Civil Trial Pool.

IV. COMPLAINT: The Complaint shall be served within 120 days of filing. Failure to perfect service within 120 days shall subject the action to dismissal without prejudice or dropping of that party as a defendant. If plaintiff shows good cause or excusable neglect for failure to serve within 120 days, the court shall extend the time for service for an appropriate period. (Fla. R. Civ. P. 1.070(j)).

V. NOTICE OF SERVICE OF COMPLAINT: Upon service of the complaint on the last of all named defendants in a civil action, the plaintiff will file a Notice of Service and provide a courtesy copy of the Notice of Service to the assigned trial judge. A fillable PDF form "Notice of Service" is available on the Circuit's webpage (www.17th.flcourts.org).

VI. NOTICE OF RELATED CASE(S) (i.e., cases involving the same parties, same subject matter or incident, or same property at issue): The Parties shall file a Notice of Related Case(s) within thirty (30) days from the date of this Order identifying any and all related cases.

VII. MANDATORY FINAL CASE MANAGEMENT CONFERENCE:

A. A Final Case Management Conference will be set not less than ninety (90) days before the date the case is set for trial.

B. At least ten (10) days before the final case management conference the parties must confer to prepare a case status report, which must be filed with the clerk of the court either before or at the time of the final case management conference. The status report must contain in separately numbered paragraphs the items set forth in Fla. R. Civ. P. 1.201(d).

VIII. CASE MANAGEMENT HEARINGS:

A. The Court shall schedule periodic case management conferences and hearings on lengthy motions at reasonable intervals based on the particular needs of the action. In addition to the conferral required under rule 1.202, the parties must confer no later than 15 days prior to each case management conference or hearing. Parties must notify the court immediately if a case management conference or hearing time becomes unnecessary. Failure to timely notify the court that a case management conference or hearing time is unnecessary may result in sanctions. (Fla. R. Civ. P. 1.201(c)(4)).

IX. INITIAL DISCOVERY DISCLOSURES:

A. Parties must make initial discovery disclosures required by Florida Rule of Civil Procedure 1.280 **within 60 days after the service of the complaint or joinder**, unless a different time is set by court order. Pursuant to Local Rule 10A, a party may file a

motion for ex parte relief where no motion for extension of time has been filed and the nonmoving party has completely failed to comply with Florida Rule of Civil Procedure 1.280(a).

B. A party may not seek discovery from any source before that party's initial disclosures are served on the other party, except when authorized by stipulation or by court order. (Fla. R. Civ. P. 1.280(f)(1)).

C. As set forth in Rule 1.280(a)(1), initial discovery disclosures include:
   1. The name and, if known, the address, telephone number, and e-mail address of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;
   2. A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control (or, if not in the disclosing party's possession, custody, or control, a description by category and location of such information) and may use to support its claims or defenses, unless the use would be solely for impeachment;
   3. A computation for each category of damages claimed by the disclosing party and a copy of the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; provided that a party is not required to provide computations as to noneconomic damages, but the party must identify categories of damages claimed and provide supporting documents; and
   4. A copy of any insurance policy or agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

D. A party who has made a disclosure under this rule or who has responded to an interrogatory, a request for production, or a request for admission **must** supplement or correct its disclosure or response: (a) in a timely manner if the party learns that in some material respect the disclosure or response is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing; or (b) as ordered by the court. (Fla. R. Civ. P. 1.280(g)).

X. CASE MANAGEMENT AND TRIAL DEADLINES:

The following deadlines apply unless otherwise modified by the Court.

	EVENTS	COMPLETION DEADLINE
1.	Service of Complaint	120 days from filing; Service under extension is only by court order.

2.	Resolution of all motions/objections directed to the pleadings *(i.e. to dismiss or strike)*	120 days before Calendar Call (must be set within 10 days of filing to be heard within 60 days)
3.	Pleading Amendments/Adding New Parties	150 days before Calendar Call
4.	Disclosure of Fact Witnesses/Lists	150 days before Calendar Call
5.	Disclosure of Expert Witnesses/Lists	150 days before Calendar Call
6.	Completion of Compulsory Examinations	120 days before Calendar Call
7.	Disclosure of Rebuttal Witnesses/Lists	100 days before Calendar Call
8.	Completion of all Discovery (including expert discovery)	30 days before Calendar Call (must be initiated 90 days before Calendar Call)
9.	Filing of all Dispositive Motions and Motions for Summary Judgment	90 days before Calendar Call
10.	Expert Challenges and Deposition Objections	45 days before Calendar Call (must be filed and heard)
11.	Filing of all Pretrial Motions (including Motions in Limine)	30 days before Calendar Call
12.	Deposition Designations	20 days before Calendar Call
13.	Deadline for Mediation	60 days before Calendar Call

XI. WITNESS LISTS:

A. NO LATER THAN ONE HUNDRED AND FIFTY (150) DAYS PRIOR TO CALENDAR CALL:

Fact Witnesses:
Parties must file and serve a list of names and addresses of all fact witnesses who are expected to testify at trial. Each party's fact witness list must include a brief description of the substance and scope of the testimony to be elicited from such witness. Both sides must cooperate in the scheduling of such witness depositions.

B. NO LATER THAN ONE HUNDRED AND FIFTY (150) DAYS PRIOR TO CALENDAR CALL:

Expert Witnesses:

1. At the time of disclosure of all expert witnesses, the parties shall file and serve the names and addresses of all expert witnesses to be called at trial, including their complete and updated curriculum vitae, and all information regarding expert testimony that is required by Fla. R. Civ. P. 1.280(c)(5). Parties shall furnish opposing counsel with two (2) alternative dates of availability of all expert witnesses for the purpose of taking their deposition. Both parties shall cooperate in the scheduling of expert depositions.

2. The parties shall also provide answers to standard form expert interrogatories pursuant to Fla. R. Civ. P. 1.280(c)(5). All reports or other data compiled by each disclosed expert which is intended to be used by the expert and/or referred to during his/her deposition testimony shall be provided electronically to the opposing party at least 72 hours prior to the date of the scheduled deposition.

3. If a party has named an expert witness in a field in which any other parties have not identified experts, the other parties may name experts in that field within thirty (30) days thereafter. No additional experts may be named unless good cause is shown. (Fla. R. Civ. P. 1.201(c)(1)).

4. Not more than 10 days after the date set for naming experts, the parties must meet and schedule dates for deposition of experts and all other witnesses not yet deposed. Any party may file the completed discovery deposition schedule agreed on or entered by the court. Once filed, the deposition dates in the schedule may not be altered without consent of all parties or on order of the court. Failure to comply with the discovery schedule may result in sanctions in accordance with Rule 1.380. (Fla. R. Civ. P. 1.201(c)(2)).

C. NO LATER THAN ONE HUNDRED (100) DAYS PRIOR TO CALENDAR CALL:

Rebuttal Witnesses:
Parties must file and serve a list of names and addresses of any rebuttal witnesses within one hundred (100) days prior to Calendar Call.

XII. COMPULSORY MEDICAL EVALUATIONS ("CME"):

A. NO LATER THAN ONE HUNDRED AND TWENTY (120) DAYS PRIOR TO CALENDAR CALL:

All CME and other examinations pursuant to Florida Rule of Civil Procedure 1.360 must be completed no later than one hundred and twenty (120) days prior to Calendar Call.

XIII. DISCOVERY DEADLINES**:**

A. NO LATER THAN NINETY (90) DAYS PRIOR TO CALENDAR CALL:

All final discovery must have been initiated at least ninety (90) days prior to Calendar Call.

B. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

Parties must complete all discovery, including expert discovery in accordance with Florida Rule of Civil Procedure 1.280(c)(5), at least thirty (30) days prior to Calendar Call. Discovery conducted after this time period is strongly disfavored and will only be permitted by order of the Court under exceptional circumstances.

C. ELECTRONICALLY STORED INFORMATION (ESI) DISCOVERY:

ESI discovery procedures are governed by Seventeenth Judicial Circuit Administrative Order 2021-20-Gen, a copy of which is available on the Circuit's webpage (www.17th.flcourts.org).

XIV. MOTIONS:

A. CONFERRAL PRIOR TO FILING MOTIONS:

Before filing a non-dispositive motion, the movant **MUST** confer with the opposing party in a good-faith effort to resolve the issues raised in the motion **AND** at the end of the motion and above the signature block, the movant **MUST** include a certificate of conferral. (Fla. R. Civ. P. 1.202(a)-(b)). **The parties are expected to confer and attempt to resolve the issues raised in the motion before reserving hearing time**.

The requirements of rule 1.202 do not apply when the movant or the nonmovant is unrepresented by counsel (pro se). (Fla. R. Civ. P. 1.202(c)).

B. NO LATER THAN ONE HUNDRED AND FIFTY (150) DAYS PRIOR TO CALENDAR CALL:

1. Motions to Add a Party or Parties or to Amend the Pleadings: must be filed and set for hearing no later than one hundred and fifty (150) days before Calendar Call absent good cause shown. The deadline shall not conflict with Florida Rule of Civil Procedure 1.190(e), and the motion may be denied if there has been undue delay, bad faith, prejudice to the opposing side, dilatory motive on the part of the moving party or when the amendment would be futile.

C. NO LATER THAN ONE HUNDRED AND TWENTY (120) DAYS PRIOR TO CALENDAR CALL:

1. Motions/Objections Directed to the Pleadings: all objections to the pleadings must be filed and set for hearing no later than one hundred and twenty (120) days before Calendar Call. **The motion/objection MUST be set within ten (10) days of filing of the motion/objection to be heard within sixty (60) days**.

D. NO LATER THAN NINETY (90) DAYS PRIOR TO CALENDAR CALL:

1. Motions for Summary Judgment and other Dispositive Motions: must be filed no later than ninety (90) days before Calendar Call. Motions for summary judgment will not be heard at or after Calendar Call unless approved by the court. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Response to Motion for Summary Judgment: the response and supporting factual position must be served no later than forty (40) days after service of the motion for summary judgment. (Fla. R. Civ. P. 1.510(c)(5)).

E. NO LATER THAN FORTY-FIVE (45) DAYS PRIOR TO CALENDAR CALL:

1. Expert Challenges: motions challenging an expert witness ("Expert Challenges"), must be filed and heard no later than forty-five (45) days before Calendar Call.

2. Deposition Objections: objections raised in depositions expected to be introduced at trial must be filed and heard no later than forty-five (45) days before Calendar Call.

F. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

1. Motions in Limine: must be filed no later than thirty (30) days prior to Calendar Call. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Pretrial Motions: must be filed and heard no later than thirty (30) days prior to Calendar Call. All motions, other than motions in limine, not heard before Calendar Call will be deemed abandoned.

G. NO LATER THAN TWENTY (20) DAYS PRIOR TO CALENDAR CALL:

1. Deposition Designations: no later than twenty (20) days prior to Calendar Call, each party must serve designation of depositions, or portions of depositions, each intends to offer as testimony.

XV. JOINT PRETRIAL STIPULATION:

A. NO LATER THAN TEN (10) DAYS PRIOR TO CALENDAR CALL:

1. The Joint Pretrial Stipulation contemplates a single document that must be filed and served, **with a courtesy copy served on the undersigned judge**, no later than ten (10) days prior to Calendar Call.

2. The Joint Pretrial Stipulation requires that all agreed matters be fully identified and any disputed matters be specifically delineated with respect to each party.

B. THE JOINT PRETRIAL STIPULATION MUST CONTAIN THE FOLLOWING IN SEPARATELY NUMBERED PARAGRAPHS:

1. Statement of the Facts: A concise, impartial statement of the facts of the case.
2. Stipulated Facts: A list of those facts that can be stipulated and require no proof at trial.
3. Statement of Disputed Law and Fact: A concise, impartial statement of those issues of law and fact that are to be tried.
4. Exhibit Lists: Each party must separately list all exhibits they intend to introduce into evidence. Each item must be listed by number and description on a separate schedule attached to the Joint Pretrial Stipulation. Each exhibit must be specifically described. **Generic descriptions of exhibits are subject to being stricken.** If any party objects to the introduction of any such exhibit, such objection **must be stated in the Joint Pretrial Stipulation**, setting forth the grounds with specificity. All exhibits must have been made available to all parties for examination no later than ten (10) days before Calendar Call. Parties must initial each other's exhibit lists and exhibits. **At trial, only those exhibits properly listed and initialed may be offered into evidence**.
5. Demonstrative Exhibits: all demonstrative exhibits (e.g., charts, graphs, enlargements of exhibits, etc.) intended to be used at a jury trial must be displayed to all parties at least ten (10) days before Calendar Call. **Objections to a demonstrative exhibit must be disclosed in the pretrial stipulation or will be deemed waived.**
6. Witness Lists: Parties must furnish a written list containing the names and addresses of all witnesses intended to be called at trial in alphabetical order. Such list must designate the type of witness ("expert," "rebuttal," "impeachment," or otherwise) and must be attached to the Joint Pretrial Stipulation. All fact witness lists must include a brief description of **the substance and scope of the testimony** to be elicited from such witness. All expert witness lists must **designate the expert's specialties**. If any party objects to any witness, such objection must be stated in the Joint Pretrial Stipulation, setting forth the grounds with specificity. **At trial, only those witnesses properly and timely disclosed will be permitted to testify**.
7. Jury Instructions: If the trial is a jury trial, the parties must identify all agreed upon standard instructions and all special instructions. Copies of all agreed upon jury instructions and disputed jury instructions must be attached to the Joint Pretrial Stipulation identifying the party that proposed the instruction, along with copies of supporting statutory citations and/or case law.
8. Verdict Forms: If the trial is a jury trial, the jury verdict form must be designated as "agreed to" or "disputed" and must be attached to the Joint Pretrial Stipulation.
9. Peremptory Challenges: If the trial is a jury trial, the number of peremptory challenges for each party must be stated and attached to the Joint Pretrial Stipulation.

10. Pending Motions: Parties must set forth a list of all pending motions with copies attached to the Joint Pretrial Stipulation.
11. Trial Estimate: Each party must provide an estimate of the number of trial days required for presenting its side of the case.
12. Expert Challenges: All motions challenging an expert witness must be filed and heard no later than forty-five (45) days before Calendar Call. FAILURE TO DO SO MAY CONSTITUTE A WAIVER OF ANY EXPERT RELATED EVIDENCE ISSUE(S). It is within the discretion of the Court to remove any case with pending expert issues.

XVI. COURT POLICIES**:**

A. Parties must do all things reasonable and necessary to assure the availability of witnesses for the entire Trial Period or to otherwise preserve witness testimony for trial as provided by the Florida Rules of Civil Procedure. *See* Fla. R. Civ. P. 1.300 & 1.460; *see also* Fla. R. Gen. Prac. & Jud. Admin. 2.545.

B. The requirements of this Order cannot be waived by stipulation **absent prior approval from the Court** pursuant to written agreement between the parties.

C. At trial, there will only be one (1) official record transcribed by one (1) court reporter. Plaintiff is responsible for arranging for a court reporter unless otherwise agreed to by the parties. If a conflict exists, the parties must resolve it among themselves prior to Calendar Call.

XVII. TRIAL CONTINUANCES**:**

A. The parties must satisfy the requirements of Rule 1.460 to change the trial period.

B. Continuance of the trial of a complex action will rarely be granted and then only upon good cause shown. Any motion for continuation will be governed by Florida Rule of Civil Procedure 1.460. (Fla. R. Civ. P. 1.201(b)(3)).

C. No continuances will be granted without Court Order upon written motion setting forth good cause pursuant to In re: Amend. to Fla. R. Civ. P., No. SC23-0962 (December 5, 2024), Fla. R. Civ. P. 1.460, and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e). All motions seeking a continuance must comply with Fla. R. Civ. P. 1.460 and Fla. R. Gen. Prac. & Jud. Admin. 2.545.

D. A motion to continue trial must be in writing unless made at trial and, except for good cause shown, must be signed by the named party requesting the continuance. The motion must be filed promptly after the appearance of good cause to support such motion. Failure to properly request a continuance may be a basis for denying the motion to continue. (Fla. R. Civ. P. 1.460(b)-(c) and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e)).

E. All motions for continuance, even if agreed, must state with specificity as set forth in rule 1.460(d).

F. **NO** CONTINUANCES will be granted based on the lack of due diligence in preparing for trial.

G. **NO** CONTINUANCES will be granted for reasons that should have been readily apparent to the parties when this Order was issued.

H. **NO** CONTINUANCES will be granted if expert witnesses are unavailable because testimony may be preserved by deposition.

I. **NO** CONTINUANCES will be granted for reasons relating to the failure to follow this Order.

J. If a continuance is granted based on the dilatory conduct of an attorney or named party, the court may consider imposing sanctions on the attorney, the party, or both.

XVIII. MEDIATION:

A. Mandatory Mediation: must commence no later than sixty (60) days prior to Calendar Call. The parties must comply with Florida Rules of Civil Procedure 1.700, 1.710, 1.720, and 1.730 as to the conduct of mediation. The parties may attend mediation through the use of communication technology (remotely) if mutually agreed upon. The Court will resolve any disagreement as to where or how mediation is to be conducted. Plaintiff's counsel is appointed lead counsel to facilitate and schedule the settlement conference with the mediator and all parties.

The Court appoints: _____ as Mediator, unless, within thirty (30) days of service of initial process on the last defendant or thirty (30) days from the date of this Order, whichever occurs later, the parties choose a different Mediator, and file notice of that choice and the name of the substitute mediator with the Clerk of Court. Failure to attend mediation may result in sanctions.

XIX. SANCTIONS: All parties should be familiar with Florida Rule of Civil Procedure 1.380 entitled "Failure to Make Discovery; Sanctions" and section 57.105, Florida Statutes, entitled "Attorney's fee; sanctions for raising unsupported claims or defenses; exceptions; service of motions; damages for delay of litigation."

FAILURE TO APPEAR, FAILURE TO FOLLOW TIME REQUIREMENTS, OR FAILURE TO FILE DOCUMENTS REQUIRED BY THIS COURT MAY RESULT IN THE DISMISSAL OF THE ACTION OR THE IMPOSITION OF SANCTIONS INCLUDING THE STRIKING OF PLEADINGS.

XX. SETTLEMENT NOTIFICATION: Parties must immediately notify the Court in the event of settlement and submit a stipulation for an Order of Dismissal. Parties shall also cancel any and all pending hearings as a result of the settlement.

XXI. COMPLIANCE WITH DIVISIONAL PROCEDURES: Attorneys and self-represented litigants are required to read and comply with the division's procedures located on the 17th Judicial Circuit Court's Website (www.17th.flcourts.org). Failure to do so may result in appropriate sanctions, as permitted by law.

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____

CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "H"

UNIFORM CASE MANAGEMENT ORDER
(CIRCUIT CIVIL STREAMLINED TRACK)

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE DEADLINES LISTED HEREIN **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND A MANDATORY CASE MANAGEMENT CONFERENCE MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND. (Fla. R. Civ. P. 1.200(j)(6)).

THIS CASE MANAGEMENT ORDER SUPERSEDES ANY PRIOR CASE MANAGEMENT ORDER ENTERED IN THIS CASE.

This case has been designated to the **STREAMLINED CIVIL TRACK**. The deadlines established by this Order are to ensure the case is disposed of within 12 months from the date of service of initial process on the last defendant or 120 days after commencement of the action as provided in rule 1.050, whichever occurs first. Accordingly, the following procedures and deadlines shall be strictly observed by the parties and enforced by the court:

1. SCHEDULING OF A MANDATORY CASE MANAGEMENT CONFERENCE:

   ☐(Applicable if checked): A **MANDATORY** Case Management Conference will be held on zoom (_____) or in Courtroom _____ on _____ at _____ am/pm.

   During the case management conference, the Court may elect to hear any pending motion, even if the parties have not identified the motion as an issue to be resolved. Motions for summary judgment and matters requiring an evidentiary hearing may not be heard unless agreed to by the parties and the court. (Fla. R. Civ. P. 1.200(j)(2)).

   On any matters ruled upon, unless otherwise ordered, within five (5) days following the Case Management Conference, counsel for Plaintiff(s) shall prepare an order pursuant to Florida Rule of Civil Procedure 1.200(j)(5).

2. COMPLAINT: The Complaint shall be served within 120 days of filing. Failure to perfect service within 120 days shall subject the action to dismissal without prejudice or dropping of that party as a defendant. If plaintiff shows good cause or excusable neglect for failure to serve within 120 days, the court shall extend the time for service for an appropriate period. (Fla. R. Civ. P. 1.070(j)).

3. NOTICE OF SERVICE OF COMPLAINT: Upon service of the complaint on the last of all named defendants in a civil action, the plaintiff will file a Notice of Service and provide a courtesy copy of the Notice of Service to the assigned trial judge. A fillable PDF form "Notice of Service" is available on the Circuit's webpage (www.17th.flcourts.org).

4. TRIAL: Trial will be set in accordance with Florida Rule of Civil Procedure 1.440. The court will issue a separate Uniform Trial Order scheduling Calendar Call and setting the Trial Period. The action no longer needs to be "at issue" prior to the case being set for trial. The failure of the pleadings to be closed will not preclude the court from setting a case for trial. (Fla. R. Civ. P. 1.440).

5. INITIAL DISCOVERY DISCLOSURES:

   A. Parties must make initial discovery disclosures required by Florida Rule of Civil Procedure 1.280 **within 60 days after the service of the complaint or joinder**, unless a different time is set by court order. Pursuant to Local Rule 10A, a party may file a motion for ex parte relief where no motion for extension of time has been filed and the nonmoving party has completely failed to comply with Florida Rule of Civil Procedure 1.280(a).

   B. A party may not seek discovery from any source before that party's initial disclosures are served on the other party, except when authorized by stipulation or by court order. (Fla. R. Civ. P. 1.280(f)(1)).

   C. As set forth in Rule 1.280(a)(1), initial discovery disclosures include:
      1. The name and, if known, the address, telephone number, and e-mail address of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;
      2. A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control (or, if not in the disclosing party's possession, custody, or control, a description by category and location of such information) and may use to support its claims or defenses, unless the use would be solely for impeachment;
      3. A computation for each category of damages claimed by the disclosing party and a copy of the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; provided that a party is not required to provide computations as to noneconomic damages, but the party must identify categories of damages claimed and provide supporting documents; and
      4. A copy of any insurance policy or agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

   D. A party who has made a disclosure under this rule or who has responded to an interrogatory, a request for production, or a request for admission **must** supplement or

correct its disclosure or response: (a) in a timely manner if the party learns that in some material respect the disclosure or response is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing; or (b) as ordered by the court. (Fla. R. Civ. P. 1.280(g)).

6. NOTICE OF RELATED CASE(S) (i.e., cases involving the same parties, same subject matter or incident, or same property at issue): The Parties shall file a Notice of Related Case(s) within thirty (30) days from the date of this Order identifying any and all related cases.

7. ATTORNEY/PRO SE PARTY PREPARATION: Attorneys and self-represented litigants who appear at a case management conference **MUST** be prepared on the pending matters in the case, be prepared to make decisions about future progress and conduct of the case, and have authority to make representations to the court and enter into binding agreements concerning motions, issues, and scheduling. If a party is represented by more than 1 attorney, the attorney(s) present at a case management conference must be prepared with all attorneys' availability for future events. (Fla. R. Civ. P. 1.200(j)(3)).

8. CASE MANAGEMENT DEADLINES:

   A. **DEADLINES IN THIS CASE MANAGEMENT ORDER MUST BE STRICTLY ENFORCED UNLESS CHANGED BY COURT ORDER FOR GOOD CAUSE SHOWN. (Fla. R. Civ. P. 1.200(e)(1)).**

   B. Notices of unavailability and/or inability to comply with the deadlines have no effect on the case management deadlines set by this order. If a party is unable to comply with a deadline, including due to the unavailability of hearing time, the party must take action consistent with Florida Rule of Civil Procedure 1.200(e)(1). (Fla. R. Civ. P. 1.200(f)-(g)).

9. CASE MANAGEMENT AND TRIAL DEADLINES:

The following deadlines apply unless otherwise modified by the Court.

	EVENTS	COMPLETION DEADLINE
1.	Service of Complaint	120 days from filing; Service under extension is only by court order.
2.	Resolution of all motions/objections directed to the pleadings *(i.e. to dismiss or strike)*	180 days before Calendar Call (must be set within 10 days of filing to be heard within 60 days)
3.	Pleading Amendments/Adding New Parties	180 days before Calendar Call

4.	Disclosure of Fact Witnesses/Lists	100 days before Calendar Call
5.	Disclosure of Expert Witnesses/Lists	100 days before Calendar Call
6.	Completion of Compulsory Examinations	100 days before Calendar Call
7.	Disclosure of Rebuttal Witnesses/Lists	60 days before Calendar Call
8.	Completion of all Discovery (including expert discovery)	30 days before Calendar Call (must be initiated 60 days before Calendar Call)
9.	Filing of all Dispositive Motions and Motions for Summary Judgment	90 days before Calendar Call
10.	Expert Challenges and Deposition Objections	45 days before Calendar Call (must be filed and heard)
11.	Filing of all Pretrial Motions (including Motions in Limine)	30 days before Calendar Call
12.	Deposition Designations	20 days before Calendar Call
13.	Deadline for Mediation	30 days before Calendar Call

10. WITNESS LISTS:

A. NO LATER THAN ONE HUNDRED (100) DAYS PRIOR TO CALENDAR CALL:

Fact Witnesses:
Parties must file and serve a list of names and addresses of all fact witnesses who are expected to testify at trial. Each party's fact witness list must include a brief description of the substance and scope of the testimony to be elicited from such witness. Both sides must cooperate in the scheduling of such witness depositions.

B. NO LATER THAN ONE HUNDRED (100) DAYS PRIOR TO CALENDAR CALL:

Expert Witnesses:

1. At the time of disclosure of all expert witnesses, the parties shall file and serve the names and addresses of all expert witnesses to be called at trial, including their

complete and updated curriculum vitae, and all information regarding expert testimony that is required by Fla. R. Civ. P. 1.280(c)(5). Parties shall furnish opposing counsel with two (2) alternative dates of availability of all expert witnesses for the purpose of taking their deposition. Both parties shall cooperate in the scheduling of expert depositions.

2. The parties shall also provide answers to standard form expert interrogatories pursuant to Fla. R. Civ. P. 1.280(c)(5). All reports or other data compiled by each disclosed expert which is intended to be used by the expert and/or referred to during his/her deposition testimony shall be provided electronically to the opposing party at least 72 hours prior to the date of the scheduled deposition.

C. NO LATER THAN SIXTY (60) DAYS PRIOR TO CALENDAR CALL:

Rebuttal Witnesses:
Parties must file and serve a list of names and addresses of any rebuttal witnesses within sixty (60) days prior to Calendar Call.

11. COMPULSORY MEDICAL EVALUATIONS ("CME"):

A. NO LATER THAN ONE HUNDRED (100) DAYS PRIOR TO CALENDAR CALL:

All CME and other examinations pursuant to Florida Rule of Civil Procedure 1.360 must be completed no later than one hundred (100) days prior to Calendar Call.

12. DISCOVERY DEADLINES**:**

A. NO LATER THAN SIXTY (60) DAYS PRIOR TO CALENDAR CALL:

All final discovery must have been initiated at least sixty (60) days prior to Calendar Call.

B. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

Parties must complete all discovery, including expert discovery in accordance with Florida Rule of Civil Procedure 1.280(c)(5), at least thirty (30) days prior to Calendar Call. Discovery conducted after this time period is strongly disfavored and will only be permitted by order of the Court under exceptional circumstances.

C. ELECTRONICALLY STORED INFORMATION (ESI) DISCOVERY:

ESI discovery procedures are governed by Seventeenth Judicial Circuit Administrative Order 2021-20-Gen, a copy of which is available on the Circuit's webpage (www.17th.flcourts.org).

13. MOTIONS:

A. CONFERRAL PRIOR TO FILING MOTIONS:

Before filing a non-dispositive motion, the movant **MUST** confer with the opposing party in a good-faith effort to resolve the issues raised in the motion **AND** at the end of the motion and above the signature block, the movant **MUST** include a certificate of conferral. (Fla. R. Civ. P. 1.202(a)-(b)). **The parties are expected to confer and attempt to resolve the issues raised in the motion before reserving hearing time**.

The requirements of rule 1.202 do not apply when the movant or the nonmovant is unrepresented by counsel (pro se). (Fla. R. Civ. P. 1.202(c)).

B. NO LATER THAN ONE HUNDRED AND EIGHTY (180) DAYS PRIOR TO CALENDAR CALL:

1. Motions to Add a Party or Parties or to Amend the Pleadings: must be filed and set for hearing no later than one hundred and eighty (180) days before Calendar Call absent good cause shown. The deadline shall not conflict with Florida Rule of Civil Procedure 1.190(e), and the motion may be denied if there has been undue delay, bad faith, prejudice to the opposing side, dilatory motive on the part of the moving party or when the amendment would be futile.

2. Motions/Objections Directed to the Pleadings: all objections to the pleadings must be filed and set for hearing no later than one hundred and eighty (180) days before Calendar Call. **The motion/objection MUST be set within ten (10) days of filing of the motion/objection to be heard within sixty (60) days**.

C. NO LATER THAN NINETY (90) DAYS PRIOR TO CALENDAR CALL:

1. Motions for Summary Judgment and other Dispositive Motions: must be filed no later than ninety (90) days before Calendar Call. Motions for summary judgment will not be heard at or after Calendar Call unless approved by the court. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Response to Motion for Summary Judgment: the response and supporting factual position must be served no later than forty (40) days after service of the motion for summary judgment. (Fla. R. Civ. P. 1.510(c)(5)).

D. NO LATER THAN FORTY-FIVE (45) DAYS PRIOR TO CALENDAR CALL:

1. Expert Challenges: motions challenging an expert witness ("Expert Challenges"), must be filed and heard no later than forty-five (45) days before Calendar Call.

2. Deposition Objections: objections raised in depositions expected to be introduced at trial must be filed and heard no later than forty-five (45) days before Calendar Call.

E. NO LATER THAN THIRTY (30) DAYS PRIOR TO CALENDAR CALL:

1. Motions in Limine: must be filed no later than thirty (30) days prior to Calendar Call. If the Court has granted the parties' request for a hearing on the motion, but a hearing is not available prior to the deadline, the parties shall submit the fully briefed motion and opposition (if any) to the court prior to the expiration of the deadline, and the court can rule on those motions on the papers. Failure to timely submit the paperwork to the court will deem those motions abandoned.

2. Pretrial Motions: must be filed and heard no later than thirty (30) days prior to Calendar Call. All motions, other than motions in limine, not heard before Calendar Call will be deemed abandoned.

F. NO LATER THAN TWENTY (20) DAYS PRIOR TO CALENDAR CALL:

1. Deposition Designations: no later than twenty (20) days prior to Calendar Call, each party must serve designation of depositions, or portions of depositions, each intends to offer as testimony.

14. JOINT PRETRIAL STIPULATION:

A. NO LATER THAN TEN (10) DAYS PRIOR TO CALENDAR CALL:

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15. COURT POLICIES**:**

A. Parties must do all things reasonable and necessary to assure the availability of witnesses for the entire Trial Period or to otherwise preserve witness testimony for trial as provided by the Florida Rules of Civil Procedure. *See* Fla. R. Civ. P. 1.300 & 1.460; *see also* Fla. R. Gen. Prac. & Jud. Admin. 2.545.

B. The requirements of this Order cannot be waived by stipulation **absent prior approval from the Court** pursuant to written agreement between the parties.

C. This Order may be tailored by the assigned Division Judge to conform to the particular requirements of the residential foreclosure and complex litigation divisions.

D. At trial, there will only be one (1) official record transcribed by one (1) court reporter. Plaintiff is responsible for arranging for a court reporter unless otherwise agreed to by

the parties. If a conflict exists, the parties must resolve it among themselves prior to Calendar Call.

16. TRIAL CONTINUANCES**:**

A. The parties must satisfy the requirements of Rule 1.460 to change the trial period.

B. A motion to continue is disfavored and will rarely be granted. No continuances will be granted without Court Order upon written motion setting forth good cause pursuant to In re: Amend. to Fla. R. Civ. P., No. SC23-0962 (December 5, 2024), Fla. R. Civ. P. 1.460, and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e). All motions seeking a continuance must comply with Fla. R. Civ. P. 1.460 and Fla. R. Gen. Prac. & Jud. Admin. 2.545.

C. A motion to continue trial must be in writing unless made at trial and, except for good cause shown, must be signed by the named party requesting the continuance. The motion must be filed promptly after the appearance of good cause to support such motion. Failure to properly request a continuance may be a basis for denying the motion to continue. (Fla. R. Civ. P. 1.460(b)-(c) and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e)).

D. All motions for continuance, even if agreed, must state with specificity as set forth in rule 1.460(d).

E. **NO** CONTINUANCES will be granted based on the lack of due diligence in preparing for trial.

F. **NO** CONTINUANCES will be granted for reasons that should have been readily apparent to the parties when this Order was issued.

G. **NO** CONTINUANCES will be granted if expert witnesses are unavailable because testimony may be preserved by deposition.

H. **NO** CONTINUANCES will be granted for reasons relating to the failure to follow this Order.

I. If a continuance is granted based on the dilatory conduct of an attorney or named party, the court may consider imposing sanctions on the attorney, the party, or both.

17. MEDIATION:

A. Mandatory Mediation: must commence no later than thirty (30) days prior to Calendar Call. The parties must comply with Florida Rules of Civil Procedure 1.700, 1.710, 1.720, and 1.730 as to the conduct of mediation. The parties may attend mediation through the use of communication technology (remotely) if mutually agreed upon. The Court will resolve any disagreement as to where or how mediation is to be conducted. Plaintiff's counsel is appointed lead counsel to facilitate and schedule the settlement conference with the mediator and all parties.

The Court appoints: _____ as Mediator, unless, within thirty (30) days of service of initial process on the last defendant or thirty (30) days from the date of this Order, whichever occurs later, the parties choose a different Mediator, and file notice of that choice and the name of the substitute mediator with the Clerk of Court. Failure to attend mediation may result in sanctions.

18. SANCTIONS: All parties should be familiar with Florida Rule of Civil Procedure 1.380 entitled "Failure to Make Discovery; Sanctions" and section 57.105, Florida Statutes, entitled "Attorney's fee; sanctions for raising unsupported claims or defenses; exceptions; service of motions; damages for delay of litigation."

    FAILURE TO APPEAR, FAILURE TO FOLLOW TIME REQUIREMENTS, OR FAILURE TO FILE DOCUMENTS REQUIRED BY THIS COURT MAY RESULT IN THE DISMISSAL OF THE ACTION OR THE IMPOSITION OF SANCTIONS INCLUDING THE STRIKING OF PLEADINGS.

19. SETTLEMENT NOTIFICATION: Parties must immediately notify the Court in the event of settlement and submit a stipulation for an Order of Dismissal. Parties shall also cancel any and all pending hearings as a result of the settlement.

20. COMPLIANCE WITH DIVISIONAL PROCEDURES: Attorneys and self-represented litigants are required to read and comply with the division's procedures located on the 17th Judicial Circuit Court's Website (www.17th.flcourts.org). Failure to do so may result in appropriate sanctions, as permitted by law.

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____
CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "I"

UNIFORM TRIAL ORDER/SETTING CASE FOR TRIAL (CIRCUIT CIVIL STREAMLINED TRACK)

ALL PARTIES MUST READ CAREFULLY/STRICT COMPLIANCE IS MANDATORY

THE UNIFORM TRIAL DATE LISTED HEREIN IS A **FIRM** TRIAL DATE AND DEADLINES **MUST** BE **STRICTLY ENFORCED** UNLESS CHANGED BY COURT ORDER. STRICT COMPLIANCE MEANS NO CONTINUANCES OR EXTENSIONS WILL BE GRANTED WITHOUT COURT ORDER UPON WRITTEN MOTION SETTING FORTH GOOD CAUSE, PURSUANT TO IN RE: AMEND. TO FLA. R. CIV. P., NO. SC23-0962 (December 5, 2024), FLA. R. CIV. P. 1.200, FLA. R. CIV. P. 1.460, AND FLA. R. GEN. PRAC. & JUD. ADMIN. 2.545(e).

FAILURE TO ATTEND CALENDAR CALL MAY RESULT IN THE COURT DISMISSING THE ACTION, ENTERING A DEFAULT, STRIKING THE PLEADINGS, LIMITING PROOF OF WITNESSES, OR ANY OTHER APPROPRIATE ACTION AGAINST THE PARTY FAILING TO ATTEND.

THIS UNIFORM TRIAL ORDER SUPERSEDES ANY PRIOR UNIFORM TRIAL ORDER ENTERED IN THIS CASE.

TRIAL PERIOD COMMENCING: _____.

CALENDAR CALL: _____.

I. ORDER OF TRIALS:

Parties are subject to being called to commence trial during any portion of the above noted Trial Period, unless otherwise ordered by the Court.

II. TRIAL DATE:

The Court has determined this case is ready for trial pursuant to Florida Rule of Civil Procedure 1.440. This case is set for trial before the undersigned Judge in Courtroom _____ , Broward County Courthouse, 201 S.E. 6th Street, Fort Lauderdale, Florida, 33301, as stated above.

III. CIVIL TRIAL POOL:

Parties are advised that this case may be placed into the Seventeenth Judicial Circuit Court's "Civil Trial Pool" and is subject to being called for trial before any judge. If placed in the Civil Trial Pool, **parties must be prepared to proceed to trial if called.** Only the Division Judge or the Administrative Judge of the Seventeenth Judicial Circuit Court's Civil Division may grant a continuance of any case placed in the Civil Trial Pool.

IV. TRIAL CONTINUANCES:

A. The parties must satisfy the requirements of Rule 1.460 to change the trial period.

B. A motion to continue is disfavored and will rarely be granted. No continuances will be granted without Court Order upon written motion setting forth good cause pursuant to In re: Amend. to Fla. R. Civ. P., No. SC23-0962 (December 5, 2024), Fla. R. Civ. P. 1.460, and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e). All motions seeking a continuance must comply with Fla. R. Civ. P. 1.460 and Fla. R. Gen. Prac. & Jud. Admin. 2.545.

C. A motion to continue trial must be in writing unless made at trial and, except for good cause shown, must be signed by the named party requesting the continuance. The motion must be filed promptly after the appearance of good cause to support such motion. Failure to properly request a continuance may be a basis for denying the motion to continue. (Fla. R. Civ. P. 1.460(b)-(c) and Fla. R. Gen. Prac. & Jud. Admin. 2.545(e)).

D. All motions for continuance, even if agreed, must state with specificity as set forth in rule 1.460(d).

E. **NO** CONTINUANCES will be granted based on the lack of due diligence in preparing for trial.

F. **NO** CONTINUANCES will be granted for reasons that should have been readily apparent to the parties when this Order was issued.

G. **NO** CONTINUANCES will be granted if expert witnesses are unavailable because testimony may be preserved by deposition.

H. **NO** CONTINUANCES will be granted for reasons relating to the failure to follow this Order.

I. If a continuance is granted based on the dilatory conduct of an attorney or named party, the court may consider imposing sanctions on the attorney, the party, or both.

V. <u>COMPLIANCE WITH THE CASE MANAGEMENT ORDER</u>:

Parties are required to strictly comply and adhere to the deadlines and requirements set forth in the Case Management Order. Strict compliance of the Case Management Order and the Uniform Trial Order is **<u>MANDATORY</u>**. Failure to comply may result in appropriate sanctions, including, but not limited to, dismissal of the action or striking of pleadings, or any other sanctions as permitted by law. (Fla. R. Civ. P. 1.200(j)(6)).

DONE AND ORDERED in Chambers, Fort Lauderdale, Florida, this _____ day of _____, _____.

_____

CIRCUIT COURT JUDGE

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 20140, 201 S.E. 6th Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

EXHIBIT "J"

UNIFORM ORDER SETTING PRETRIAL DEADLINES AND RELATED REQUIREMENTS
(STREAMLINED COUNTY CIVIL CASE)

THE DEADLINES ESTABLISHED IN THIS ORDER WILL BE STRICTLY ENFORCED BY THE COURT

(___Applicable if checked): CASE MANAGEMENT CONFERENCE:

(___Applicable if checked): PRETRIAL CONFERENCE:

(___Applicable if checked): CALENDAR CALL:

(If not checked, dates may be provided at a later time.)

PROJECTED TRIAL PERIOD:

NOTE: A firm trial date will be issued no later than 45 days prior to the Projected Trial Period pursuant to Rule 1.440(2), Fla. R. Civ. P.

Once a firm trial date is issued, NO CONTINUANCES will be granted without Court Order based on a prior written motion in conformity with Rule 1.460, Fla. R. Civ. P., and Rule 2.545(e), Fla. R. Gen. Prac. & Jud. Admin.

BY ORDER OF THE COURT the following requirements are imposed on all parties:

1. REQUIREMENTS OF PRETRIAL ORDER CANNOT BE WAIVED BY STIPULATION.
2. SERVICE OF COMPLAINTS AND SERVICE UNDER EXTENSIONS: Complaints must be served within **120** days after filing of the initial pleading directed to that defendant, unless the Court has granted an extension pursuant to Rules 1.070(j) or 1.200(e)(3), Fla. R. Civ. P. If an extension is granted, the Complaint must be served by the deadline set forth in the order granting the extension.
3. NEW PARTIES: The addition of new parties must occur no later than **45** days from the date of this Order.

4. COMPLETION OF FACT DISCOVERY: Fact discovery must be served and completed no later than **120** days from the date of this Order.
5. COMPLETION OF EXPERT DISCOVERY: Expert witness names and addresses must be disclosed by the Plaintiff no later than **60** days from the date of this Order and by Defendant no later than **70** days from the date of this Order. Expert discovery must be served and completed no later than **140** days from the date of this Order. No continuances will be granted because expert witnesses are unavailable for trial because their testimony may be preserved by deposition.

PRETRIAL STIPULATION REQUIREMENTS

6. A JOINT PRETRIAL STIPULATION must be filed, with a copy delivered to the Court, no later than **170** days from the date of this Order. THE COURT DOES NOT ACCEPT UNILATERAL PRETRIAL STIPULATIONS. It is the responsibility of all parties to cooperate in good faith in preparation of the Joint Pretrial Stipulation. FAILURE TO COMPLY WITH THIS REQUIREMENT WILL RESULT IN SANCTIONS. Any Unilateral Pretrial Stipulation filed will be *sua sponte* STRICKEN and sanctions imposed on the party filing it. Failure to file a complete Joint Pretrial Stipulation, including witness lists, exhibit lists, jury instructions and verdict forms (if a jury trial has been timely demanded), will result in postponement of the trial, and/or sanctions including dismissal and/or default. If either party delays the preparation of the Joint Stipulation, a motion describing the delay must be immediately filed with the Clerk of Court and brought to the Court's attention prior to the deadline. The Stipulation must be a **single, unified submission** and must contain the following information in separately numbered paragraphs or sections:
    a. Concise, impartial statement of the facts of case.
    b. List of any stipulated facts requiring no proof at trial.
    c. Statement of disputed issues of law and fact to be tried.
    d. Exhibits must be listed by number and specific description on a separate schedule attached to the stipulation. Generic descriptions of exhibits will be stricken. Any evidentiary objections to any exhibit of an opposing party must be delineated with specificity.
    e. Witnesses', including "rebuttal" or "impeachment" witnesses, names and addresses must be listed by name numerically on a separate schedule attached to the stipulation. Witnesses MUST be listed by actual NAME of the witness, and not designation (i.e., use of such

designations as "Corporate Representative," "Records Custodian," and "Adjuster" standing alone is insufficient). All expert witnesses must be so designated. Only those witnesses listed by NAME will be permitted to testify at trial.

f. Agreed jury instructions and disputed jury instructions must be filed as part of the Pretrial Stipulation if a jury trial has been timely demanded. Disputed instructions must be identified as to the party that proposed the instruction.

g. Agreed verdict form or disputed verdict forms must be filed as part of the Pretrial Stipulation if a jury trial has been timely demanded.

7. Failure to file a complete, unified Pretrial Stipulation, including jury instructions and verdict forms if a jury trial has been timely demanded, will result in sanctions including dismissal and/or default.

8. At trial the parties must be **STRICTLY LIMITED** to exhibits and witnesses disclosed and objections reserved in the Pretrial Stipulation. A party desiring to use an exhibit, examination or test result, or witness discovered after the deadlines set forth in this Order must immediately, upon discovery, notify all other counsel and the Court by written motion. Use of the exhibit, examination or test result, or witness may be allowed for extraordinary cause shown or to prevent manifest injustice.

MEDIATION AND ARBITRATION

9. ( ) applicable if checked: MEDIATION; Simultaneously herewith, the parties are being referred to mandatory mediation, which shall be completed within 270 days of the date of this order unless an Order Referring Case to Mediation is issued, then the mediation must occur no later than the deadline set forth in that order.

10. ARBITRATION: If an Order Referring Case to Arbitration is issued, the arbitration must be completed no later than the deadline set forth in that order.

11. FAILURE TO MEDIATE OR ARBITRATE IN GOOD FAITH MAY RESULT IN THE ISSUANCE OF SANCTIONS INCLUDING, BUT NOT LIMITED TO, DISMISSAL OR DEFAULT.

DEADLINES FOR PRETRIAL MOTIONS

12. Motions and objections directed to the pleadings including, but not limited to, Motions to Dismiss, must be filed and resolved no later than **45** days from the

date of this Order.

13. Motions and objections directed to discovery must be filed and resolved no later than **150** days from the date of this Order.
14. Motions for Summary Judgment must be filed and served no later than **160** days from the date of this Order.
15. *Daubert* related objections (Fla. Stat. §90.702) must be filed and resolved no later than **210** days from the date of this Order. FAILURE TO DO SO WILL CONSTITUTE A WAIVER AT TRIAL OF ANY *DAUBERT* RELATED EVIDENCE OBJECTION OR ISSUE.
16. Motions in Limine must be filed no later than **5** days prior to the firm trial date. (A firm trial date will be issued no later than 45 days prior to the Projected Trial Period.)
17. All pretrial motions not specifically delineated above must be filed and resolved no later than **210** days from the date of this Order.
18. In the absence of good cause for failure to set any filed motion for hearing, the Court may deem the motion waived or abandoned without further notice or hearing. Matters constituting good cause will be limited to those matters unforeseen upon exercise of due diligence. Attorney workload and staffing issues, standing alone, must not constitute grounds for a claim of good cause.

EXTENSIONS OF TIME, MODIFICATIONS OF DEADLINES, AND/OR MODIFICATION OF THE PROJECTED TRIAL PERIOD ARE GOVERNED BY RULE 1.200(e) AND (g), FLA. R. CIV. P.

EXHIBIT "K"

UNIFORM ORDER SETTING PRETRIAL DEADLINES AND RELATED REQUIREMENTS
(GENERAL COUNTY CIVIL CASE)

THE DEADLINES ESTABLISHED IN THIS ORDER WILL BE STRICTLY ENFORCED BY THE COURT

(___Applicable if checked): CASE MANAGEMENT CONFERENCE:

(___Applicable if checked): PRETRIAL CONFERENCE:

(___Applicable if checked): CALENDAR CALL:

(If not checked, dates may be provided at a later time.)

PROJECTED TRIAL PERIOD:

NOTE: A firm trial date will be issued no later than 45 days prior to the Projected Trial Period pursuant to Rule 1.440(2), Fla. R. Civ. P.

Once a firm trial date is issued, NO CONTINUANCES will be granted without Court Order based on a prior written motion in conformity with Rule 1.460, Fla. R. Civ. P., and Rule 2.545(e), Fla. R. Gen. Prac. & Jud. Admin.

BY ORDER OF THE COURT the following requirements are imposed on all parties:

1. REQUIREMENTS OF PRETRIAL ORDER CANNOT BE WAIVED BY STIPULATION.
2. SERVICE OF COMPLAINTS AND SERVICE UNDER EXTENSIONS: Complaints must be served within **120** days after filing of the initial pleading directed to that defendant, unless the Court has granted an extension pursuant to Rules 1.070(j) or 1.200(e)(3), Fla. R. Civ. P. If an extension is granted, the Complaint must be served by the deadline set forth in the order granting the extension.
3. NEW PARTIES: The addition of new parties must occur no later than **75** days from the date of this Order.

4. COMPLETION OF FACT DISCOVERY: Fact discovery must be served and completed no later than **220** days from the date of this Order.
5. COMPLETION OF EXPERT DISCOVERY: Expert witness names and addresses must be disclosed by the Plaintiff no later than **170** days from the date of this Order and by Defendant no later than **180** days from the date of this Order. Expert discovery must be served and completed no later than **250** days from the date of this Order. No continuances will be granted because expert witnesses are unavailable for trial because their testimony may be preserved by deposition.

PRETRIAL STIPULATION REQUIREMENTS

6. A JOINT PRETRIAL STIPULATION must be filed, with a copy delivered to the Court, no later than **280** days from the date of this Order. THE COURT DOES NOT ACCEPT UNILATERAL PRETRIAL STIPULATIONS. It is the responsibility of all parties to cooperate in good faith in preparation of the Joint Pretrial Stipulation. FAILURE TO COMPLY WITH THIS REQUIREMENT WILL RESULT IN SANCTIONS. Any Unilateral Pretrial Stipulation filed will be *sua sponte* STRICKEN and sanctions imposed on the party filing it. Failure to file a complete Joint Pretrial Stipulation, including witness lists, exhibit lists, jury instructions and verdict forms (if a jury trial has been timely demanded), will result in postponement of the trial, and/or sanctions including dismissal and/or default. If either party delays the preparation of the Joint Stipulation, a motion describing the delay must be immediately filed with the Clerk of Court and brought to the Court's attention prior to the deadline. The Stipulation must be a **single, unified submission** and must contain the following information in separately numbered paragraphs or sections:
    a. Concise, impartial statement of the facts of case.
    b. List of any stipulated facts requiring no proof at trial.
    c. Statement of disputed issues of law and fact to be tried.
    d. Exhibits must be listed by number and specific description on a separate schedule attached to the stipulation. Generic descriptions of exhibits will be stricken. Any evidentiary objections to any exhibit of an opposing party must be delineated with specificity.
    e. Witnesses', including "rebuttal" or "impeachment" witnesses, names and addresses must be listed by name numerically on a separate schedule attached to the stipulation. Witnesses MUST be listed by actual NAME of the witness, and not designation (i.e., use of such

designations as "Corporate Representative," "Records Custodian," and "Adjuster" standing alone is insufficient). All expert witnesses must be so designated. Only those witnesses listed by NAME will be permitted to testify at trial.

f. Agreed jury instructions and disputed jury instructions must be filed as part of the Pretrial Stipulation if a jury trial has been timely demanded. Disputed instructions must be identified as to the party that proposed the instruction.

g. Agreed verdict form or disputed verdict forms must be filed as part of the Pretrial Stipulation if a jury trial has been timely demanded.

7. Failure to file a complete, unified Pretrial Stipulation, including jury instructions and verdict forms if a jury trial has been timely demanded, will result in sanctions including dismissal and/or default.

8. At trial the parties must be **STRICTLY LIMITED** to exhibits and witnesses disclosed and objections reserved in the Pretrial Stipulation. A party desiring to use an exhibit, examination or test result, or witness discovered after the deadlines set forth in this Order must immediately, upon discovery, notify all other counsel and the Court by written motion. Use of the exhibit, examination or test result, or witness may be allowed for extraordinary cause shown or to prevent manifest injustice.

MEDIATION AND ARBITRATION

9. ( ) applicable if checked: MEDIATION; Simultaneously herewith, the parties are being referred to mandatory mediation, which shall be completed within 270 days of the date of this order unless an Order Referring Case to Mediation is issued, then the mediation must occur no later than the deadline set forth in that order.

10. ARBITRATION: If an Order Referring Case to Arbitration is issued, the arbitration must be completed no later than the deadline set forth in that order.

11. FAILURE TO MEDIATE OR ARBITRATE IN GOOD FAITH MAY RESULT IN THE ISSUANCE OF SANCTIONS INCLUDING, BUT NOT LIMITED TO, DISMISSAL OR DEFAULT.

DEADLINES FOR PRETRIAL MOTIONS

12. Motions and objections directed to the pleadings including, but not limited to, Motions to Dismiss, must be filed and resolved no later than **75** days from the

date of this Order.

13. Motions and objections directed to discovery must be filed and resolved no later than **260** days from the date of this Order.
14. Motions for Summary Judgment must be filed and served no later than **290** days from the date of this Order.
15. *Daubert* related objections (Fla. Stat. §90.702) must be filed and resolved no later than **350** days from the date of this Order. FAILURE TO DO SO WILL CONSTITUTE A WAIVER AT TRIAL OF ANY *DAUBERT* RELATED EVIDENCE OBJECTION OR ISSUE.
16. Motions in Limine must be filed no later than **5** days prior to the firm trial date. (A firm trial date will be issued no later than 45 days prior to the Projected Trial Period.)
17. All pretrial motions not specifically delineated above must be filed and resolved no later than **320** days from the date of this Order.
18. In the absence of good cause for failure to set any filed motion for hearing, the Court may deem the motion waived or abandoned without further notice or hearing. Matters constituting good cause will be limited to those matters unforeseen upon exercise of due diligence. Attorney workload and staffing issues, standing alone, must not constitute grounds for a claim of good cause.

EXTENSIONS OF TIME, MODIFICATIONS OF DEADLINES, AND/OR MODIFICATION OF THE PROJECTED TRIAL PERIOD ARE GOVERNED BY RULE 1.200(e) AND (g), FLA. R. CIV. P.

EXHIBIT "L"

IN THE CIRCUIT/COUNTY OF THE SEVENTEENTH JUDICIAL CIRCUIT, IN AND FOR, BROWARD COUNTY, FLORIDA

_____ Case Number: _____

_____ Division: _____

Plaintiff(s),

vs.

_____

_____

Defendant(s).

NOTICE OF PENDING MATTER

_____ (NAME) gives notice under Fla. R. Gen. Prac. & Jud. Admin. 2.215 that judicial action in the above captioned case remains pending on _____ (NAME OF MOTION) filed on _____ (DATE MOTION FILED) _____ (ADD DOCUMENT IDENTIFICATION NUMBER HERE IF AVAILABLE).

CERTIFICATE OF SERVICE

I certify that on _____ (DATE) this document has been furnished to _____ (insert name(s) and service addresses) by ☐ e-portal mail, ☐ e-mail, or ☐ hand-delivery.

Signature: _____

Printed Name: _____

E-mail Address: _____

Address: _____

Phone Number: _____

EXHIBIT "M" (County Civil)

Pathway	Case Type
SMALL CLAIMS (Rules of Civil Procedure Not Invoked)	Not Applicable
EVICTIONS/ UNLAWFUL DETAINER	Not Applicable
STREAMLINED	Animal Abandonment or Abuse Auto Recovery/Repossession Delayed Birth Certificate Approve Minor Settlement Confirm Arbitration Award Replevin Contest Foreign Judgment Consumer Debt $8,000 or greater Enforce Foreign Judgment Foreclosure Distress $8,000 or greater Vehicle Title Transfer
GENERAL	Personal Injury Protection (PIP) Property Insurance Other Civil Damages $8,000 or greater Other Equity $8,000 or greater