

HURRICANE SANDY CASE MANAGEMENT MODEL DISCOVERY SCHEDULE
(Prepared by the Hurricane Sandy Litigation Committee)*

The Hurricane Sandy Case Management Order ("HSCMO") shall be entered in each NFIP or direct suit action upon the filing of answer. The HSCMO generally requires the completion of the discovery process within the following periods of time:

1. Automatic Disclosures by Plaintiff:
 - a. Information exchange: served not later than thirty (30) days from entry of the HSCMO
 - b. Document production: served not later than thirty (30) days from entry of the HSCMO
2. Automatic Disclosures by Defendant:
 - a. Information exchange: served not later than thirty (30) days from entry of the HSCMO
 - b. Document production: served not later than thirty (30) days from entry of the HSCMO
3. Statements of Contentions: not later than forty-five (45) days from entry of the HSCMO
4. Interrogatories: served not later than sixty (60) days from entry of the HSCMO
5. Requests for the Production of Documents: served not later than sixty (60) days from entry of the HSCMO
6. Requests for Admissions: served not later than sixty (60) days from entry of the HSCMO

* This summary of the schedule set forth in the Hurricane Sandy Case Management Order was prepared for ease of reference of judges, counsel, and parties in the cases covered by that Order.

7. Depositions of Fact Witnesses: not later than one hundred and twenty (120) days from entry of the HSCMO
8. Motions to Amend: not later than sixty (60) days from entry of the HSCMO
9. Expert Witnesses:
 - a. Plaintiff's expert reports: not later than one hundred and fifty (150) days from entry of the HSCMO
 - b. Defendant's expert reports: not later than one hundred and eighty (180) days from entry of the HSCMO
 - c. Depositions of Expert Witnesses: not later than two hundred and ten (210) days from entry of the HSCMO
10. Case Management Conference: approximately one hundred and twenty (120) days from entry of the HSCMO
11. Dispositive Motions: within the time set forth by the Court's scheduling order issued after the initial case management conference, except motions pursuant to Federal Rules of Civil Procedure 12(b)(1) and (b)(2)
12. Alternative Dispute Resolution: within the time set forth by the Court's scheduling order issued after the initial case management conference
13. Joint Final Pretrial Order: within the time set forth by the Court's scheduling order issued after the initial case management conference