

**IN THE MATTER OF ARBITRATION BETWEEN:**

**, Claimant )**

**- and -**

**, )  
Respondent )**

**) AAA Case No. 01-20-**

**)**

**) Scheduling Order**

A case management conference was held in the above matter on \_\_\_\_\_ of 2023. During the call, \_\_\_\_\_ of \_\_\_\_\_ represented the Claimant; and \_\_\_\_\_ of \_\_\_\_\_ represented the Respondent. Patricia Thomas Bittel presided over the call as the jointly selected arbitrator. The parties agreed to the following for management of the above referenced case:

- Applicable law will be \_\_\_\_\_.
- All necessary or appropriate parties are included in the arbitration.
- Parties shall amend/specify claims and/or counterclaims by \_\_\_\_\_. Responses if any are due by \_\_\_\_\_;
- Any other preliminary matters not otherwise provided for herein shall be raised by the parties by \_\_\_\_\_.
- Requests for documents shall be exchanged on or before \_\_\_\_\_. Each party may serve not more than two requests for production of documents and no more than 30 interrogatories. Answers to discovery requests re due within 30 days of receipt of requests.
- Depositions will be completed on or before \_\_\_\_\_. Depositions will be limited to \_\_\_\_ (five), with none exceeding \_\_\_\_\_ (seven) hours in length;
- Claimant's expert witnesses, if any, shall be identified on or before \_\_\_\_\_ with expert report(s) due no later than \_\_\_\_\_. Respondent's

expert witness(es) if any, shall be identified on or before \_\_\_\_ with expert report(s) due on or before \_\_\_\_.

- Discovery cut off will be \_\_\_\_\_.
- Dispositive Motions shall be due on or before \_\_, with Responses due \_\_\_\_\_ and Replies due \_\_\_\_\_. The Arbitrator will decide any Dispositive Motion on or before \_\_\_\_\_.
- The parties will identify witnesses, including a summary of expected testimony, and exhibits on or before \_\_\_\_\_. They will also identify joint exhibits and agree to a Stipulation of Uncontested Facts as of that date;
- The parties will jointly identify a court reporter and location for the hearing;
- The case will be heard on \_\_\_\_\_ in (location) \_\_\_\_\_. This is a firm date, not subject to alteration except upon a showing of good cause.
- Each party shall bring enough copies of exhibits for the court reporter if any, the Arbitrator, opposing counsel and the witnesses.
- In the event issues arise in the course of discovery which the parties are unable to resolve through joint discussion, the Case Administrator, \_\_\_\_\_, should be requested to schedule a conference call.
- All written communications with either the AAA or the Arbitrator must be copied to opposing counsel, and all telephonic communications must be by conference call with both parties on the line. The parties agree that there will be no *ex parte* communication with the Arbitrator. Email submission of communications and documents is permitted.
- An additional status conference call is scheduled for \_ at \_\_\_\_\_ (time).

Respectfully Submitted,

Patricia Thomas Bittel,  
Arbitrator  
Dated: \_\_\_\_\_