

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
CHARLOTTE COUNTY, FLORIDA CIVIL ACTION

Tarsoo Park
Plaintiff(s),
vs.

Case File No: 17 266 CA
Case Type:

michele cotler
Defendant(s),
/

AGREED CASE MANAGEMENT PLAN AND ORDER

The parties hereby submit to the following Agreed Case Management Plan to the Court for approval:

Case Track Assignment² (check one – must be completed for cases filed 05/01/2012 or thereafter)

- ☐ **Expedited Track (Case resolved within 12 months):**
(It is recommended that discovery and an alternative dispute resolution be completed within 270 days after the complaint is filed and a final disposition entered within 365 days after the complaint is filed.)
- ☒ **Standard Track (Case is resolved within 18 months):**
(It is recommended that discovery and an alternative dispute resolution be completed within 450 days after the complaint is filed and a final disposition entered within 540 days after the complaint is filed.)
- ☐ **Complex Track (Case resolved within 2 years):**
(Case will likely be declared complex per Florida Rule of Civil Procedure 1.201.)

Case Deadlines and Events

DEADLINE OR EVENT	AGREED DATE
Statement of Facts and/or Counterclaim(s) Plaintiff(s): Defendant(s):	12/4/17 both
Identification of facts the parties believe to be disputed Plaintiff(s): Defendant(s):	12/4/17 both
Identification of the issues of law to be decided by the Court Plaintiff(s): Defendants(s):	12/4/17 both
Motions to Add Parties or to Amend Pleadings Plaintiff(s): Defendant(s):	1/2/18 both

² Case disposition times for all Case Tracks have been established in accordance with Florida Rule of Judicial Administration 2.250(a)(1)(B). Although Standard and Complex Track cases may or may not be resolved with a jury trial, it is expected that Expedited Track cases will be resolved without a jury trial.

Disclosure of Fact Witnesses Plaintiff(s): Defendant(s):	02/14/18 both
Disclosure of Expert Witnesses Plaintiff(s): Defendant(s):	02/14/18 both
Filing of Exhibit List Plaintiff(s): Defendant(s):	02/14/18 both
Discovery Deadline for Fact Witnesses (All discovery must be commenced in time to be completed before this date.) Plaintiff(s): Defendant(s):	3/30/18 both
Expert Opinion Available to Opposing Party (It is recommended that last exchange occur 4 months before trial and 1 – 2 months before discovery deadline to allow time for expert depositions. This does not require a written report unless otherwise required by the rule.) Plaintiff(s): Defendant(s):	3/30/18 both
Discovery Deadline for Expert Witnesses Plaintiff(s): Defendant(s):	3/30/18 both
Completion of Alternative Dispute Resolution (ADR) (Mediation is mandatory within 12 months of trial date, unless the parties stipulate to non-binding arbitration.) Deadline: Type of ADR:	11/15/17
Deadline for Hearing Dispositive Motions (All dispositive motions must be heard by the Court at least 10 days prior to the pretrial conference unless otherwise ordered by the Court.)	<u>10</u> Ten days prior to pretrial conference/or Date: _____
Pretrial Management Conference Date (Unless early ADR is selected, a pretrial conference date will be scheduled within 45 days of the date of ADR not resulting in settlement or disposition of this entire action.)	An Order will be issued by the Court scheduling this conference.
Other Deadlines or Events N/A	

Trial Information

Estimated Date the Case Will Be Prepared To Go To Trial (If counsel and unrepresented parties do not agree on the estimated date on which the case will be prepared to go to trial, or fail to file a Notice for Trial by the date indicated, the Court may on its own motion set the case for trial, or other status hearing. The filing of this plan does NOT supplant the requirement of filing a Notice for Trial.)	4/11/18
Estimated Length of Trial (specify the number of trial days):	2 day
Identification of Jury or Non-Jury Trial	Jury

The above-referenced schedule of deadlines will be strictly adhered to by the parties unless a change is otherwise agreed to by the parties and approved by the Court. The Court will consider a request to approve changes to these deadlines upon a showing of good cause by either party based on matters arising from an emergency nature or unavailability. However, once the Agreed Case Management Plan has been approved by the Court, procrastination in completing discovery or the unavailability of counsel will not constitute good cause for a change to these deadlines. The failure to abide by these deadlines may result in sanctions by the Court, including the award of attorney's fees, the striking of pleadings, and/or a dismissal of the action.

Date: 9/20/17

Signature, address, and telephone number of ALL parties.

Attorneys must include Florida Bar Number:

Michael F. Savage	126 CIT Olympia Ave #301 PLR	0044911
Jonathan P. Litney	Two N Tammami Tr, Suite 500, Sarasota	0014877

ORDER APPROVING AGREED CASE MANAGEMENT PLAN

THE COURT, having reviewed the above **Agreed Case Management Plan** and finding it to be satisfactory, it is

ORDERED AND ADJUDGED that the Agreed Case Management Plan is hereby **APPROVED** **AND ALL PARTIES SHALL ABIDE BY THE TERMS HEREIN.**

DONE AND ORDERED in Punta Gorda, Charlotte County, Florida on 9/25/2017.




HON. LISA S. PORTER, CIRCUIT JUDGE

Conformed Copies to the Civil Case Manager and to all parties (attach certificate of service).

Conformed Copies to the Civil Case Manager and to:

LUTZ, BOBO & TELFAIR, PA
ONE SARASOTA TOWER
TWO NORTH TAMiami TRAIL, FIFTH FLOOR
SARASOTA, FL 34236

SAVAGE LAW, PA
BANK OF AMERICA BUILDING, SUITE 301
126 EAST OLYMPIA AVENUE
PUNTA GORDA, FL 33950


Deborah Hamsharie
Judicial Assistant

SEP 25 2017