

EXHIBIT A

JUDGE ANDRÉ BIROTTE JR.
SCHEDULE OF PRETRIAL AND TRIAL DATES WORKSHEET

Please complete this worksheet jointly and file it with your Joint Rule 26(f) Report.
The Court ORDERS the parties to make every effort to agree on dates.

Case No.	Case Name:				
Trial and Final Pretrial Conference Dates		Pl(s)' Date mm/dd/yyyy	Def(s)' Date mm/dd/yyyy	Court Order mm/dd/yyyy	
Check one: <input checked="" type="checkbox"/> Jury Trial or <input type="checkbox"/> Court Trial (Tuesday at 8:30 a.m., within 18 months after Complaint filed) Estimated Duration: <u>20</u> Days		03/23/2021	03/23/2021	<input type="checkbox"/> Jury Trial <input type="checkbox"/> Court Trial _____ Days	
Final Pretrial Conference ("FPTC") [L.R. 16], Hearing on Motions In Limine (Friday at 11:00 a.m., at least 17 days before trial)		03/05/2021	03/05/2021		
Event ¹ <i>Note:</i> Hearings shall be on Fridays at 10:00 a.m. Other dates can be any day of the week.		Weeks Before FPTC	Pl(s)' Date mm/dd/yyyy	Def(s)' Date mm/dd/yyyy	Court Order mm/dd/yyyy
Last Date to Hear Motion to Amend Pleadings /Add Parties [Friday]			10/23/2020	10/23/2020	
Non-Expert Discovery Cut-Off (no later than deadline for <u>filing</u> dispositive motion)		17	09/01/2020	10/23/2020	
Expert Disclosure (Initial)			09/11/2020	09/11/2020	
Expert Disclosure (Rebuttal)			10/9/2020	10/9/2020	
Expert Discovery Cut-Off		12 ²	12/11/2020	12/11/2020	
Last Date to Hear Motions [Friday] <ul style="list-style-type: none"> • Rule 56 Motion due at least 5 weeks before hearing • Opposition due 2 weeks after Motion is filed • Reply due 1 week after Opposition is filed 		12	12/11/2020	12/11/2020	
Deadline to Complete Settlement Conference [L.R. 16-15] <u>Select one:</u> <input type="checkbox"/> 1. Magistrate Judge (<i>with Court approval</i>) <input type="checkbox"/> 2. Court's Mediation Panel <input type="checkbox"/> 3. Private Mediation		10	12/25/2020	12/25/2020	<input type="checkbox"/> 1. Mag. J. <input type="checkbox"/> 2. Panel <input type="checkbox"/> 3. Private
Trial Filings (first round) <ul style="list-style-type: none"> • Motions In Limine • Memoranda of Contentions of Fact and Law [L.R. 16-4] • Witness Lists [L.R. 16-5] • Joint Exhibit List [L.R. 16-6.1] • Joint Status Report Regarding Settlement • Proposed Findings of Fact and Conclusions of Law [L.R. 52] (<i>court trial only</i>) • Declarations containing Direct Testimony, if ordered (<i>court trial only</i>) 		3	03/02/2021	03/02/2021	
Trial Filings (second round) <ul style="list-style-type: none"> • Oppositions to Motions In Limine • Joint Proposed Final Pretrial Conference Order [L.R. 16-7] • Joint/Agreed Proposed Jury Instructions (<i>jury trial only</i>) • Disputed Proposed Jury Instructions (<i>jury trial only</i>) • Joint Proposed Verdict Forms (<i>jury trial only</i>) • Joint Proposed Statement of the Case (<i>jury trial only</i>) • Proposed Additional Voir Dire Questions, if any (<i>jury trial only</i>) • Evidentiary Objections to Decls. of Direct Testimony (<i>court trial only</i>) 		2	03/09/2021	03/09/2021	

¹ The parties may seek dates for additional events by filing a separate Stipulation and Proposed Order. **Class actions and patent and ERISA cases in particular may need to vary from the above.**

² The parties may wish to consider cutting off expert discovery prior to the deadline for **filing** an MSJ.