

STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

STANDING CASE MANAGEMENT ORDER
FOR ALL DIVISION F (JUDGE RICHARDSON) E-FILED CASES

It is hereby ORDERED that within 30 days of receiving this order, or within 30 days of the filing of the last Defendants' final Answer (whichever is later), all parties shall jointly E-file one of the attached Consent Scheduling Orders, (Order A for Wrongful Death/Medical Malpractice/Complex Cases; Order B for all other cases) setting forth case management deadlines. In any matter in which an extended period of discovery is anticipated, parties shall contact Staff Attorney Trinity Townsend, 404-613-4512 or trinity.townsend@fultoncountyga.gov to schedule a conference.

SO ORDERED, this 24th day of September, 2019.

Judge Eric A. Richardson
State Court of Fulton County

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

Plaintiff

Civil Action No: _____

Defendant

CONSENT CASE MANAGEMENT ORDER "A"
(MEDICAL MALPRACTICE/WRONGFUL DEATH/COMPLEX CASE)

1.

PLAINTIFF'S EXPERT(S) shall be disclosed NO LATER THAN _____.

2.

DEFENSE EXPERT(S) shall be disclosed NO LATER THAN _____.

3.

REBUTTAL EXPERT(S) shall be disclosed NO LATER THAN _____ for
PLAINTIFF and _____ for DEFENSE.

4.

ALL EXPERTS shall be deposed NO LATER THAN _____.

5.

ALL WITNESSES shall be deposed NO LATER THAN _____.

6.

DISCOVERY shall close NO LATER THAN **12 MONTHS** after the last answer is filed, which
date is _____. (This includes, but is not limited to, written discovery and
depositions).

7.

(a) All PRELIMINARY MOTIONS, including, but not limited to, motions to dismiss, motions regarding venue, service, statute of limitations, or motions to add parties, shall be filed NO LATER THAN _____, absent Court Order. (No later than 60 days after the entry of this Order).

(b) All other SUBSTANTIVE MOTIONS, including motions for summary judgment, and DAUBERT MOTIONS shall be filed NO LATER THAN _____. (No later than 30 days after the close of discovery).

(c) Notwithstanding the above, any motions regarding discovery disputes shall be filed within 60 days from the date of the response or event (e.g. deposition) that is the subject of the motion, and in no event later than the close of discovery, absent Court Order. In the event of a discovery dispute, counsel and parties are ENCOURAGED to contact the Court's Staff Attorney at 404-613-4512 to set up a telephone conference PRIOR TO filing any motion to compel or for protective order.

(d) There shall be no extensions of these deadlines by agreement of the parties. Any extension of time to file a motion must be made by Order of this Court. **If any motion is filed after these deadlines and without this Court's prior written approval by Order, then the motion will be untimely and may not be considered.** All motions/briefs are LIMITED to no more than **fifteen (15)** pages, double spaced, exclusive of attachments, unless otherwise permitted by the Court in writing. Absent prior permission by the Court, no party shall file any reply briefs, which are generally disfavored.

8.

MEDIATION shall be scheduled and completed NO LATER THAN _____. (No later than 90 days after the close of discovery). Counsel and all parties, or their representatives, are to appear and participate in good faith in this mediation. Attendance by an attorney or other representative who has **full authority to settle all issues** in the action is **REQUIRED**. If the client has not given such authorization to counsel, the client must also appear.

9.

Parties shall stipulate to this Courts' trial calendar no later than 95 days after discovery closes. Parties desiring a special setting should contact Staff Attorney Trinity Townsend, 404-613-4512 or trinity.townsend@fultoncountyga.gov, NO LATER THAN the close of discovery to make such a request, understanding that a specially set trial date may not be available for approximately 6 months.

10.

The failure to comply with the deadlines set forth in this Case Management Order may result in the imposition of sanctions, including striking pleadings, assessment of attorney's fees, exclusion of evidence or witnesses, or other sanctions.

Plaintiff's Counsel

Defendant's Counsel

SO ORDERED, this ____ day of _____, 20__.

Judge Eric A. Richardson
State Court of Fulton County

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

Plaintiff

Civil Action No: _____

Defendant

CONSENT CASE MANAGEMENT ORDER "B"
(NONSPECIFIC/GENERAL CASES)

1.

DISCOVERY shall close NO LATER THAN **6 MONTHS** after the last answer is filed, which date is _____. ALL discovery shall be **COMPLETED** by this date; this includes, but is not limited to: identification of, written discovery from, and depositions from BOTH fact and expert witnesses.

2.

(a) All PRELIMINARY MOTIONS, including, but not limited to, motions to dismiss, motions regarding venue, service, statute of limitations, or motions to add parties, shall be filed NO LATER THAN _____, absent Court Order. (No later than 30 days after the entry of this Order).

(b) All other SUBSTANTIVE MOTIONS, including motions for summary judgment, and DAUBERT MOTIONS shall be filed NO LATER THAN _____. (No later than 30 days after the close of discovery).

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