

STATE OF VERMONT

SUPERIOR COURT

CIVIL DIVISION

Unit

Docket No.:

Plaintiff(s)

VS.

Defendant(s)

DISCOVERY/ALTERNATE DISPUTE RESOLUTION STIPULATION

The parties to the above entitled cause stipulate that the Court may order the following ADR and Discovery Schedule:

1. All pretrial motions, except those based on the circumstances that arise after the cutoff date or a motion to dismiss for lack of subject matter jurisdiction shall be filed by _____. Motions in Limine must be filed by the date of Jury Drawing on issues known to counsel at that time.
2. Third parties shall be brought into the action pursuant to V.R.C.P. 14 no later than _____.
3. All written Discovery shall be sent to the opposite party no later than _____. Answers thereto shall be sent no later than _____.
4. Plaintiff shall disclose experts by _____. Defendant shall depose those experts, if it chooses to do so by _____.
5. Defendant shall disclose experts by _____. Plaintiff shall depose those experts if it chooses to do so by _____.
6. Depositions of all witnesses other than expert witnesses shall be scheduled and taken no later than _____.
7. All compulsory medical examinations, if required, shall be scheduled and have been conducted by _____.
8. The parties shall agree to one of the following ADR procedures as set forth in V.R.C.P. Rule 16.3.
 - ☐ Mediation _____
Name of Neutrals(s), if agreed)
 - ☐ Binding Arbitration _____
Name of Neutrals(s), if agreed)
 - ☐ Neutral Evaluation _____
Name of Neutral, if agreed)
 - ☐ Other Method Proposed Agreement and procedure shall be submitted to the Court for approval.
9. Agreement, if any, concerning the payment of the neutral's fees and expenses shall be submitted with Stipulation.
10. The Alternate Dispute Resolution Session shall be completed by _____.
Please specify one of the following options:
 - ☐ A. Case Statement, if appropriate, shall be filed with the neutral by _____.
Necessary Discovery shall be completed by _____.
 - ☐ B. We agree to accept the assistance of the designated neutral in setting a schedule for completion of the process
11. Discovery shall be complete and this case ready for trial by _____.
Estimate Length of Trial: _____ day(s) or _____ hour(s)

Date

Attorney for Plaintiff

Date

Attorney for Plaintiff

Date

Attorney for Defendant

Date

Attorney for Defendant