



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION – CIVIL

(CASE CAPTION)

(CASE NUMBER)

**CASE MANAGEMENT ORDER
MEDICAL MALPRACTICE CASE**

AND NOW, (**MAIL DATE**), it is Ordered that:

The case management and time standards adopted for medical malpractice cases shall be applicable to this case and are hereby incorporated into this Order.

Case management protocols and other information related to the program are posted on the Court's website under the section labeled "Medical Malpractice Program" found here: <https://www.courts.phila.gov/common-pleas/trial/civil/>

1. A **One-Year Status Conference** will be scheduled any time after (**1 YEAR FROM COMMENCEMENT**) or **one year prior to the Pre-Trial Conference**. A "One-Year Status Conference Form" must be submitted by all parties at least fifteen (15) days prior to the Conference. At the One-Year Status Conference, counsel should be prepared to discuss status of discovery; expert reports; motions; disclosure of insurance coverages; MCare issues; and the possibility of early resolution.
2. All **discovery** on the above matter shall be completed not later than (**19 MONTHS**).
3. **Plaintiff** shall identify and submit **curriculum vitae and expert reports** of all expert witnesses intended to testify at trial to all other parties not later than (**20 MONTHS**).
4. **Defendant and any additional defendants** shall identify and submit **curriculum vitae and expert reports** of all expert witnesses intended to testify at trial not later than (**21 MONTHS**).
5. All **pre-trial motions** shall be filed not later than (**21 MONTHS**).
6. **Plaintiff** shall file a "Certification of Exchange of Expert Reports"* not later than ten (10) days after (**21 MONTHS**). If the certification is not timely filed, this matter will not be scheduled for a Pre-Trial Conference and additional sanctions may be imposed for failure to comply with this Order.

* Plaintiff should only file a Certification if all parties have exchanged all reports expected to be utilized at Trial.

7. ***A Pre-Trial Conference*** will be scheduled any time after ***(24 MONTHS)***. Fifteen (15) days prior to Pre-Trial Conference, all counsel shall serve all opposing counsel and file a pre-trial memorandum containing the following:
- (a). A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant;
 - (b). A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
 - (c). A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
 - (d). Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed;
 - (e). Plaintiff shall include a demand. Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability; and
 - (f). Each counsel shall provide an estimate of the anticipated length of trial.
8. ***It is expected that the case will be ready for trial (25 MONTHS)***, and counsel should anticipate trial to begin expeditiously thereafter.
9. ***A 90-Day Status Conference*** will be held ninety (90) days prior to the scheduled trial date. Counsel should be prepared to discuss the possibility of a non-trial resolution. Upon request of **all** counsel, a Settlement Conference will be scheduled with a medical malpractice judge pro tempore or a judge of the Court of Common Pleas.
10. All counsel are under a continuing obligation and are hereby ordered to serve a copy of this Order upon all unrepresented parties and upon all counsel entering an appearance subsequent to the entry of this Order.

BY THE COURT:

***(TEAM LEADER NAME), J.
TEAM LEADER***