

MASS TORT PRE-TRIAL DEADLINES

The following table reflects “default” pre-trial deadlines for mass tort actions in the Philadelphia Court of Common Pleas. Typically, the Court will provide case specific deadlines via a Case Management Order. This table should serve as a model for parties when conferring on and proposing deadlines.

DATE	ACTIVITY
180 days prior to jury selection	○ Deadline for Fact Discovery
150 days prior to jury selection	○ Deadline for Plaintiff’s Expert Reports
120 days prior to jury selection	○ Deadline for Defendants’ Expert Reports
120 days prior to jury selection	○ Deadline for dispositive motions (summary judgment and <i>Frye</i>)
90 days prior to jury selection	○ Deadline for oppositions to dispositive motions (summary judgment and <i>Frye</i>)
75 days prior to jury selection	○ Pretrial Memo to be sent via email (masstort@courts.phila.gov)
60 days prior to jury selection	○ Pre-Trial and Settlement Conference ○ Deadline for Witness and Exhibit Lists and Deposition Designations
45 days prior to jury selection	○ Deadline for objections to Witness and Exhibit Lists and Deposition Designations ○ Deadline for Counter-Designations to Deposition Designations by page and line number (objections to Counter-Designations are preserved)
30 days prior to jury selection	○ Deadline for motions <i>in limine</i>
In Accordance with Mass Tort Motion Procedures	○ Deadline for oppositions to motions <i>in limine</i>
20 days prior to jury selection	○ Deadline to file proposed jury instructions; proposed verdict form; and proposed <i>voir dire</i> questions
As needed	○ Hearing on dispositive motions, <i>Frye</i> motions, and motions <i>in limine</i>
Thursday or Friday before trial	○ Start of jury selection
Trial Date	○ Trial commences

Hon. Joshua Roberts
Mass Tort Team Leader