

IN THE PHILADELPHIA COURT OF COMMON PLEAS

IN RE: MASS TORT

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_____ **TERM,** _____

NO.: _____

**GLOBAL MASS TORT CASE MANAGEMENT ORDER
GOVERNING PRETRIAL DEADLINES**

The attached exhibit reflects the pre-trial deadlines to be observed in all Mass Tort actions in the Philadelphia Court of Common Pleas Complex Litigation Center.

BY THE COURT

Moss, J.

Date: _____

DATE	ACTIVITY
6 months prior to jury selection	Deadline for Fact Discovery
5 months prior to jury selection	Deadline for Plaintiff's Expert Reports
4 months prior to jury selection	Deadline for Defendant's Expert Reports Deadline for dispositive motions (summary judgment and <i>Frye</i>)
3 months prior to jury selection	Deadline for oppositions to dispositive motions (summary judgment and <i>Frye</i>)
2 ½ months prior to jury selection	Pretrial Memo to be delivered to 622 City Hall
2 months prior to jury selection	Pre-Trial and Settlement Conference
2 months prior to jury selection	Deadline for Witness and Exhibit Lists and Deposition Designations
45 days prior to jury selection	Deadline for objections to Witness and Exhibit Lists and to serve objections and 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>
According to Revised 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
Only as needed	Hearing on dispositive motions, <i>Frye</i> motions, and motions <i>in limine</i>
Wednesday or Thursday before trial	Start of jury selection
	Trial commences