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IN THE ESTATE OF

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IN THE PROBATE COURT

NO. TWO,

TARRANT COUNTY, TEXAS

AGREED DOCKET CONTROL PRETRIAL ORDER

On this day, the Parties agree and the Court orders the following schedule in lieu of a pretrial conference in the above cause:

a. Discovery shall be completed by _____, ____, 20__.

All depositions are to be taken by _____, ____, 20__.

b. The deadline for filing Amended Pleadings is _____, ____, 20__.

c. The deadline for filing Special Exceptions is _____, ____, 20__.

d. Experts/Witnesses.

Plaintiff(s) shall file a designation of their testifying experts by _____, ____, 20__.

Defendant(s) shall file a designation of their testifying experts by _____, ____, 20__.

All Motions to Strike Experts shall be heard by _____, ____, 20__.

e. All Dispositive Motions (Summary Judgments, Plea to Jurisdiction, Plea in Abatement, etc.) shall be heard by _____, ____, 20__.

f. Mediation shall be conducted on or before _____, ____, 20__.

g. Pretrial Hearing. This case is set for pretrial hearing on _____, ____, 20__, at _____. Each party is directed to bring to the Court all of the following:

1. A concise trial summary (please bring to the Court's attention any contested issues of law and any unique or difficult evidentiary issues you anticipate).
2. List of direct fact witnesses with their address, phone number, and subject of the testimony of each witness.
3. List of expert witnesses with their address, phone number, and subject of the testimony and opinions that will be proffered by each expert witness. If a report was made, please include their report.
4. If a jury trial, proposed jury instructions on flash drive without anything else on the drive.
5. All exhibits, pre-marked and a list of the agreed upon exhibits. If exhibits are not agreed, please list the exhibit number and specify your objection(s). To the extent possible, these will be ruled upon at the pre-trial hearing.
6. All Motions in limine with supporting argument(s). If a motion is not agreed, please list the motion and specify your objection(s). These will be ruled upon at the pretrial hearing.
7. All factual stipulations.

(Note: In order to have a productive pretrial hearing, please exchange all exhibits, list of witnesses and experts motions in limine at least 3 days prior to the pretrial hearing so the other parties have time to agree or object. The parties are expected to confer on factual stipulations and issues of law prior to the hearing. (The pretrial hearing is not for the hearing of any dispositive motions or motions to strike experts. These hearings should be set and heard prior to the pretrial hearing.))

h. Trial Setting. This matter is set for jury / non-jury trial the week of _____, _____, 20____.

(Note: Neither the pretrial hearing, nor the trial setting may be rescheduled by agreement of the parties. A court order is required.)

Signed this _____ day of _____, 20____.

Honorable Brook Bell