

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X Present: Shirley Werner Kornreich
Justice

IAS: Part 54

Plaintiff(s),

Index No.: _____

-against-

**PRELIMINARY CONFERENCE
ORDER
COMMERCIAL DIVISION**

Defendant(s).

-----X

APPEARANCES:

Plaintiff(s): _____

Defendant(s): _____

It is hereby ORDERED that disclosure shall proceed as follows:

(1) Paper Discovery Demands:

(a) Demand for a bill of particulars, demand for discovery and inspection, and interrogatories shall be served by all parties on or before _____.

(b) Responses shall be served by all parties on or before _____.

(c) Third party subpoenas, requests for commissions and letters rogatory shall be served or submitted by _____.

(2) Electronic Discovery:

Have all parties met and conferred about how electronic discovery will be conducted?

Yes _____ No _____

Have the parties entered into a stipulation governing electronic discovery?

Yes _____ No _____

The parties will enter into a stipulation governing electronic discovery by _____, or a telephone conference will be held on _____ at _____ at which time the Court will order the manner in which electronic discovery will be conducted.

(3) Depositions:

(a) Party depositions to be completed by: _____.

(b) Non-party depositions to be completed by: _____.

(c) Post-deposition document demands must be served within 20 days of the deposition giving rise to the demand.

(4) End of Fact Discovery:

(a) All fact discovery to be completed by: _____.

(5) Expert Discovery:

(a) Expert reports to be exchanged by: _____.

(b) Rebuttals to be exchanged by: _____.

(c) Expert depositions to be completed by: _____.

(5) Impleader:

(a) Impleader must be completed within 20 days of the disclosure giving rise to the impleader.

(6) Note of Issue:

(a) Plaintiff shall file a note of issue/certificate of readiness by: _____.

(b) A copy of the order setting the note of issue filing date shall be served and filed with the note of issue.

(7) Motions:

Dated: _____, *J.S.C.*