

3. The parties hereby waive the right to file motions to dismiss and/or motions for summary judgment or obtain a ruling on any such previously filed motions. The court or any party may raise matters related to subject matter jurisdiction at any time and rights to file such a motion are not waived.

4. Each party may make only one Motion to Compel if justified under applicable Rules.

5. Written discovery requests are limited as follows:

(a) Requests to Produce - maximum number: 15;

(b) Requests to Admit - maximum number: 15;

(c) Interrogatories - maximum number (including sub-parts): 20.

(IN THE EVENT THE PARTIES AGREE TO DIFFERENT NUMBERS, THESE SHOULD BE SUBSTITUTED FOR THE NUMBERS REFERENCED ABOVE.)

6. Depositions of parties, relatives of parties and employees of parties may be taken. Claims of privilege related to former employees of a party are waived and former employees of a party may be interviewed by any counsel. Depositions are limited to five (5) hours of deposition time. Additional stipulations related to deposition discovery are as follows:

(IN THE EVENT STIPULATIONS CONCERNING ADDITIONAL DEPOSITIONS OR THE MANNER AND TIME OF TAKING ARE TO BE MADE, THEY SHOULD BE INSERTED AND THE TEXT CHANGED TO REFLECT THOSE AGREEMENTS.)

7. Additional stipulations concerning expert witnesses are as follows:

(ANY AGREEMENTS CONCERNING LIMITATION ON NUMBER OF EXPERT WITNESSES, VARIATIONS IN DEPOSITION TIME FROM THOSE SPECIFIED IN THESE RULES OR OTHER STIPULATIONS CONCERNING EXPERTS SHOULD BE INSERTED.)

8. The number of trial courtroom hours shall be limited as follows:

9. All parties agree and understand that motions for withdrawal from these agreements and stipulations are discouraged and shall be granted only for good cause shown due to unusual and newly discovered circumstances.

ALL PARTIES THERETO HEREBY AGREE AND STIPULATE to each of the matters set forth herein and request that the court place this case on the “Cost Reduction Trial Track” with Limited Discovery and Pretrial Requirements and that this case further be handled in accordance with the provisions of the Local Civil Rules and ADR Plan concerning said “Cost Reduction Trial Track” and the stipulations and agreements set forth herein.

DATED this __ day of _____ , ____.

PLAINTIFF(S)

ATTORNEY(S) FOR PLAINTIFF(S)

DEFENDANT(S)

ATTORNEY(S) FOR DEFENDANT(S)

A PROPOSED ORDER SEEKING APPROVAL OF THIS AGREEMENT WILL PROMPTLY BE FILED BY ABOVE COUNSEL.