

JOINT CASE MANAGEMENT REPORT

Description of case and issues including facts and theory of liability and/or defenses:

Catalina Belen Cortes Leiva et al v. GPS Global Pilot School Corp. et al

Case # 2020-CA-010478

On August 5th, 2019 Plaintiffs, Catlina Belen Cortes Leiva and Marcelo Eduardo

Pleading status:

At issue: yes no (Refer to Rule 1.440(a), Fla.R.Civ.P.)

Open motions: (list motions and date of filing)

Counter-Defendant's Motion to Dismiss for failure to state cause of action, and

Anticipated need for amendment of complaint, answer, or affirmative defenses:

yes no

Deadline for completion of the above: 07/07/2022

Status of outstanding discovery:

List date/s of exchange of discovery including interrogatories, requests to produce, document subpoenas, and requests to admit: (date propounded and date of responses)

Plaintiff's Request for Admissions filed on 5/15/2020 Responded on 7/24/2020. Plain

As to each discovery: Objections filed yes no: meet and confer held (date):

Privilege raised yes no, privilege log filed (date): _____

Outstanding Discovery Issues: yes no, list motions and date of filing:

Additional interrogatories, request to produce or requests to admit planned:

yes no. If yes, what form and by deadline: 10/07/2022

Fact discovery:

Schedule of fact witness depositions by name and date taken or planned:

Deposition of Defendant, GPS Global Pilot School Corp's Corporate Representative

Expert Discovery:

Schedule of expert witness by name and date taken or planned:

Undetermined at this time.

Deadline for expert disclosure: (list dates)

10/7/2022

Deadline for any planned examinations or inspections/or date occurred: (list by expert and date)

12/7/2022

Deadline of exchange of expert reports/or discovery: (list dates)

12/7/2022

Dispositive motions anticipated and a deadline and briefing schedule for such motions (list)

2/7/2023

Mediation efforts and a deadline for mediation and the name of mediator selected (list)

12/7/2022

Trial readiness:

Date which the parties will be ready for trial and must specify whether the trial requested was originally jury or bench.

jury bench Trial ready date: 03/07/2023

NO schedule proposed may exceed Florida Rule of Judicial Administration Time Standards, which provides 12 months for nonjury trials and 18 months for jury trials unless this action qualifies as a complex case under Rule 1.201, Fla.R.Civ.P.

/s/ Laurence Trias

s/Plaintiff's Counsel

s/Defense Counsel