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| COURT FILE NUMBER |       |
| COURT | Court of King’s Bench of Alberta |
| JUDICIAL CENTRE | Click to Select Judicial Centre. |
| APPLICANT |       |
| RESPONDENT |       |
| [OTHER PARTIES] |       |
| DOCUMENT | **LITIGATION PLAN** |
| ORDER PREPARED BY | Identify party preparing litigation plan. |

Clerk’s Stamp

**Pursuant to rule 4.4(2),** the Plaintiff [or defendant] [add name of party] proposes this litigation plan for a completion and timing of steps in this action to facilitate readiness for trial by the date scheduled.

# Pleadings

1. [If pleadings have not closed, amendments are expected, or new parties have been added, deadlines to close all pleadings or exchange proposed amendments must be included here, with details on who must provide and when.]

# Disclosure of Records

2. [If this stage is not complete, deadlines must be included for each party.]

# Questioning

3. The plaintiff shall complete questioning of the persons it/he/she is entitled and chooses to examine as adverse in interest or associated with parties adverse in interest, by \_\_\_\_\_\_\_\_\_\_\_.

4. The defendant shall complete questioning of the persons it/he/she is entitled and chooses as adverse in interest or associated with parties adverse in interest, by \_\_\_\_\_\_\_\_\_\_\_.

5. [If there are third-parties, include separate parties for each of them, setting out their deadlines for questioning.]

# Undertaking Responses

6. Each party shall use best efforts to answer all undertakings no later than 45 days after the date they were given; and for undertakings not answered by that deadline, shall state what steps are being taken to obtain the answers and when they are expected.

# Interlocutory Applications

7. Where necessary, interlocutory applications must be made in a timely manner so as not to interfere with the dates in this litigation plan and with this action being ready for trial by its scheduled commencement date.

# Alternative Dispute Resolution

8. A judicial dispute resolution or alternative dispute resolution shall be completed by \_\_\_\_\_\_\_\_\_\_, subject to the availability of the court or third-party mediator; or, in the alternative, a party will apply to the court for an order dispensing with the requirement for this process.

# Experts

9. Each party’s primary expert reports shall be served by no later than \_\_\_\_\_\_\_\_\_\_.

10. Each party’s rebuttal expert reports shall by served by no later than \_\_\_\_\_\_\_\_\_\_.

11. Surrebuttal expert reports, if needed and proper, shall be served by \_\_\_\_\_\_\_\_\_\_.

# Trial Confirmation

12. No later than [120 days before scheduled commencement of trial], the parties must jointly certify their readiness to proceed with the trial in the prescribed form or attend before the court for further directions.

# Changes to Litigation Plan

13. The deadlines in this litigation plan may be amended by agreement in writing if a new deadline is not more than seven days later than the date set out herein. Other amendments to the dates require approval of the court, failing which the date for trial will be vacated.