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| COURT FILE NUMBER |      Clerk’s Stamp |
| COURT | COURT OF KING’S BENCH OF ALBERTA |
| JUDICIAL CENTRE | Click to Select Judicial Centre. |
| APPLICANT(S) |       |
| RESPONDENT(S) |       |
| Other Parties |       |
| DOCUMENT | Litigation Plan |

|  |  |
| --- | --- |
| Order Prepared By | Enter party who prepared this litigation plan. |

DATE ON WHICH ORDER WAS PRONOUNCED: **Click to Enter a Date**

LOCATION OF HEARING: **Click to Select Hearing Location**

NAME OF JUSTICE WHO GRANTED THIS ORDER:

**Pursuant to rules 4.4(1), 4.4(2) and 4.3(3) and Notice to the Profession and Public # 2025-02**, the Parties are required to adhere to the contents of this litigation plan for the completion and timing of steps in this action to facilitate readiness for trial as set out in this Litigation Plan, subject to any further Order of the Court.

And noting that the first statement of defence was served in this matter on Enter Date (**Trigger Date**) and the Civil Trial Target is Enter Date.

## 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.
2. Any third party claims shall be filed and served within 6 months from the Trigger Date.
3. Any statement of defence to third party claims shall be filed and served within 7 months of the Trigger Date.
4. Any reply to statements of defence to third party claims shall be filed and served within 8 months of the Trigger Date.

## Disclosure of Records

1. Plaintiff(s) Affidavit(s) of Records shall be served within 3 months of the Trigger Date.
2. Defendant(s) Affidavit(s) of Records shall be served within 5 months of the Trigger Date.
3. Third Party(ies) Affidavit(s) of Records shall be served within 10 months of the Trigger Date.

## Questioning and Medical Examinations (Part 5 of the Rules of Court)

1. Identification of witnesses for Part 5 Questioning shall be completed via delivery of proposed witness lists within 12 months of the Trigger Date.
2. The plaintiff(s) 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, within 17 months of the Trigger Date.
3. Any medical examinations performed pursuant to the *Rules of Court* shall be completed within 19 months of the Trigger Date.
4. The defendant(s) shall complete questioning of the persons it/he/she is entitled and chooses as adverse in interest or associated with parties adverse in interest, within 22 months of the Trigger Date.
5. Any Third Party(ies) shall complete questioning of the persons it/he/she is entitled and chooses as adverse in interest or associated with parties adverse in interest, within 25 months of the Trigger Date.
6. Each party shall use best efforts to answer all undertakings no later than 2 months 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.
7. Any final Part 5 Questioning of any party, questioning on undertaking responses or further document production shall be completed within 27 months of the Trigger Date.

## Experts

1. Each party’s primary expert reports shall be served by no later than 29 months from the Trigger Date.
2. Each party’s rebuttal expert reports shall be served by no later than 31 months from the Trigger Date.
3. Surrebuttal expert reports, if needed and proper, shall be served by no later than 33 months from the Trigger Date.
4. Notices of objection to expert reports shall be provided within 1 month of receipt of the expert report.

## Alternative Dispute Resolution

1. An alternative dispute resolution process shall be completed as soon as reasonably possible and appropriate in the parties’ discretion, but not later than 33 months from the Trigger Date, or, in the alternative, a party shall apply to the court for an order dispensing with the requirement for this process on or before this time.

## Interlocutory Applications

1. 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. The making of an interlocutory application does not stay or suspend the deadlines in this Litigation Plan.
2. The parties anticipate the following interlocutory applications will be completed by the following dates:

Enter interlocutory applications, and their associated completion dates.

## Trial

1. The parties shall make all reasonable efforts to ensure that the Trial of this action is scheduled to commence not later than 36 months from the Trigger Date.
2. The parties shall apply for a trial date not later than 22 months after the Trigger Date.This requirement is only amendable by court order or by way of a “suspension period” agreed to in writing pursuant to rule 4.33.

## Changes to Litigation Plan

1. After trial is scheduled or ordered to be scheduled, 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.

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Justice of the Court of King’s Bench of Alberta