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**SUPREME COURT OF THE STATE OF NEW YORK
QUEENS COUNTY: IAS PART**

PRESENT: HON.

Justice

-----x

Plaintiffs(s),

Index Number _____

- against -

Date RJI Filed: _____

Defendant(s).

-----x

Preliminary Conference Order

APPEARANCES

Plaintiff(s) _____

Defendant(s) _____

Following a Preliminary Conference, it is hereby **ORDERED** that disclosure shall proceed as follows:

(1) **Insurance Coverage:** If not yet done, _____ shall disclose in writing the existence and contents of any insurance agreement as described in CPLR § 3101(f) on or before _____.

(2) **Bill of Particulars:**

(a) A demand for a bill of particulars shall be served by _____ on or before _____.

(b) A bill of particulars shall be served by _____ on or before _____.

(c) A supplemental bill of particulars shall be served by _____ as to Items _____ on or before _____.

(3) **Medical Records and Authorizations:** On or before _____, duly executed written authorizations shall be furnished by _____ for the following:

- ____ Physician, and/or hospital, and/or autopsy records;
- ____ Employment records for the period _____;
- ____ No-fault file;
- ____ Other (specify) _____

(4) **Physical Examinations:**

(a) Examination of _____ shall be held on or before _____.

(b) Pursuant to 22 NYCRR §202.17(b), at least 20 days before such examination, _____ shall serve upon all other parties copies of the medical reports of those physicians who have previously treated or examined him/her.

© A copy of the examining physician's report shall be furnished to all parties by _____ within _____ days of the examination.

(5) **Depositions:**

(a) Examinations before trial shall be conducted as follows:

Plaintiff(s) shall appear for examination before trial at _____ on _____, at _____ a.m./p.m. and shall produce all relevant books, papers, records, and other material for use at the deposition, including _____.

Defendant(s) shall appear for examination before trial at _____ on _____, at _____ a.m./p.m. and shall produce all relevant books, papers, records, and other material for use at the deposition, including _____.

(b) Unless otherwise directed prior to the examinations before trial, attorneys seeking rulings on objections or making application for any other relief pertaining to the depositions shall promptly appear at Chambers with their reporter, or shall communicate with Chambers by telephone conference call, or shall, if necessary, communicate with the Justice assigned to handle emergencies, for a determination.

© Once begun, a deposition shall continue until completed and shall not be adjourned without further order of the Court.

(d) The transcript of an examination before trial shall be delivered to the party deposed within thirty (30) days of the deposition, and shall be returned, duly executed, within twenty (20) days thereafter.

(e) Subpoenas for the examination before trial of any non-party witness shall be served no later than forty-five (45) days after the completion of party depositions.

(6) **Other Disclosure:**

(a) On or before _____, all parties shall exchange names and addresses of all witnesses, and shall exchange statements of opposing parties and photographs, or, if none, shall provide an affirmation to that effect.

(b) On or before _____, all parties shall exchange information relating to expert witnesses in compliance with CPLR §3101(D)(1).

© Demands for discovery and inspection shall be served on or before _____. Each item sought shall be produced unless an objection to its production is raised. All such objections shall be made no later than ten (10) days after the demand is received.

(d) Other (interrogatories, etc.) _____

(7) **Additional Disclosure Issues:** With respect to additional disclosure issues, the parties shall comply with the following agreement: _____

(8) **Impleaders:** All third-party actions shall be commenced on or before _____ .
Joinder of a third-party action beyond this date without leave of Court may result in a severance.

(9) **Completion of Disclosure:** All disclosure shall be completed on or before _____ .

(10) **Note of Issue:**

(a) _____ shall file a note of issue/certificate of readiness on or before _____ .

(b) A copy of the filed note of issue/certificate of readiness, together with an affidavit of service, shall be furnished to Chambers within ten (10) days of the filing.

(11) **Motions for Summary Judgment:** Pursuant to CPLR Rule 3212(a), any motion for summary judgment shall be made no later than _____ days after the filing of the note of issue.

(12) **Compliance Conference:** Unless a note of issue/certificate of readiness shall have been filed prior thereto, counsel for all parties shall appear at a compliance conference which shall be held in this Part on _____ .

Bring medical reports and pleadings to Compliance Conference and be prepared to discuss settlement at that time.

Pursuant to 22 NYCRR 202.28, attorney for plaintiff is directed to file a stipulation or statement of discontinuance with the part of court to which the action has been assigned within 20 days of such discontinuance.

Failure to comply with any provision of this order may result in the imposition of costs, or sanctions, or other action authorized by law.

SO ORDERED:

J.S.C.

Dated:

The contents and provisions of the foregoing order are agreed to, and receipt of a copy of the order is acknowledged:

Attorney for Plaintiff _____

Attorney for Defendant _____

Attorney for Plaintiff _____

Attorney for Defendant _____

Attorney for Plaintiff _____

Attorney for Defendant _____

Attorney for Plaintiff _____

Attorney for Defendant _____

