

EXHIBIT 2

CAPTION, : IN THE COURT OF COMMON PLEAS OF
Plaintiff : DAUPHIN COUNTY, PENNSYLVANIA
 :
v. : NO.
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, :
Defendants : CIVIL ACTION – LAW
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CASE MANAGEMENT ORDER

AND NOW, this _____ day of _____, 20__, following a Status Conference held _____, 20__, the following scheduling dates are established:

1. Factual Discovery Closes on _____.
2. Plaintiff(s) shall produce all Expert Reports and Curriculum Vitae by _____.
3. Defendant(s) shall produce all Expert Reports and Curriculum Vitae by _____.

4. Dispositive Motions with Briefs shall be filed by _____. A *courtesy copy shall be served on Judge Dowling's Chambers.*
5. Briefs in Response to Dispositive Motions shall be filed by _____. *A courtesy copy shall be served on Judge Dowling's Chambers.*
6. A Certificate of Readiness must be filed for the Dispositive Motion to be assigned to the Court for disposition. The Certificate of Readiness must include if Oral Argument is requested or is not requested.
7. Mediation is encouraged and should be pursued at an appropriate time.
8. Motions *in Limine* with Briefs shall be filed by _____. *A courtesy copy shall be served on Judge Dowling's Chambers.*
9. Briefs in Response to Motions *in Limine* to be filed by _____. *A courtesy copy shall be served on Judge Dowling's Chambers.*
10. Pre-Trial Memoranda to be filed by _____. *A courtesy copy shall be served on Judge Dowling's Chambers. In addition to the requirements of L.R. 212.2, Pre-Trial Memoranda shall contain the names of all witnesses, attach copies of all Expert Reports and indicate Stipulations agreed and Stipulations desired. The parties should identify anticipated evidentiary issues at trial.*
11. Pre-Trial Conference will be held **with the attorneys only** on _____ at a time to be scheduled by Court Administration. At the Pre-Trial Conference, the parties shall provide the Court with their proposed points for charge and proposed verdict form. The parties shall attempt to agree on a proposed verdict form.

12. Jury Selection will occur on _____, 20__ at 1:00 p.m. **OR**
_____, 20__ at 1:00 p.m.

Trial to be held during the trial term **commencing** _____. It is anticipated that this case will last __ **days**.

This Order automatically lists this case for the trial term commencing _____ and counsel are to consider themselves attached for the duration of the trial term.

If the case settles, Plaintiff's attorney shall immediately inform Chambers and Court Administration.

Extension or modification of the foregoing deadlines, including the date for trial, **may** be granted upon Motion by a party for good cause shown or agreement of the parties. With the Court's full trial schedule, any extension that is granted could result in a significant postponement of trial.

BY THE COURT:

Andrew H. Dowling, Judge

Distribution:

The Honorable Andrew H. Dowling
Counsel for Plaintiff(s)
Counsel for Defendant(s)
Lili Hagenbuch, Deputy Court Administrator (Civil)