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State of New York
Supreme Court: County of Rensselaer

**DISCOVERY STIPULATION
and ORDER
CHILD VICTIMS ACT (“CVA”) CASES**

Title: TT v Hoosic Valley CSD

Index: EF2021-269598

It is hereby **STIPULATED AND ORDERED** that discovery shall proceed as follows:

- 1) (If agreed by the parties) the case is scheduled for an EARLY DISPUTE RESOLUTION conference on to be determined.
- 2) The parties will exchange Party Statements (Schedules A and B) and provide the same to the court (via email directly to Chambers) by 10/31/21. Any confidential information contained therein (e.g. the identity of anonymous parties) shall be kept confidential. The statements will not be admissible for any purpose and shall not be used to limit proof.
- 3) All paper discovery, including the exchange of bills of particulars (or interrogatories), authorizations and responses to discovery demands shall be completed on or before 1/31/22. The court on its own motion hereby permits the use of interrogatories in addition to depositions pursuant to CPLR 3130.
- 4) Party depositions shall be held on or before 6/30/22.
Non-party depositions shall be held on or before 8/31/22.
- 5) Defense medical exam(s) are to be held on or before 8/31/22 and the report is to be provided within 30 days thereafter.
- 6) A status conference is scheduled for 1/11/22 at 10:00.
- 7) Plaintiff shall file the note of issue on or before 10/31/22.

8) Expert disclosure shall be governed by CPLR 3101 (the Expert Disclosure Rule for the Third Judicial District has been suspended for CVA cases).

9) Dispositive motions shall be fully submitted no more than 90 days after the note of issue is filed.

10) Further directive(s) _____

Counsel agreed by video.

(Plaintiff Counsel – sign and print name)

(Defendant Counsel – sign and print name)

(Defendant Counsel – sign and print name)

SO ORDERED.

L. Michael Mackey

L. Michael Mackey, J.S.C.
Dated: *9/28/21*