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State of New York  
 Supreme Court: County of Schoharie

**DISCOVERY STIPULATION**

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**Title:** Federal National Mortgage Association fka Fannie Mae v. Dufek, Jr., et al.

**ORDER**

**Index No:** 2022-3

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

- 1) All paper discovery, including the exchange of bill of particulars, authorizations and responses to discovery demands shall be completed on or before \_\_\_\_\_.
- 2) Party depositions shall be held on or before \_\_\_\_\_.  
 Non-party depositions shall be held on or before \_\_\_\_\_.
- 3) Independent medical exam(s) are to be held on or before \_\_\_\_\_ and the report is to be provided 60 days thereafter.
- 4) Plaintiff shall file the note of issue on or before \_\_\_\_\_.
- 5) Expert disclosure shall be in compliance with the Expert Disclosure rule for the Third Judicial District.
- 6) Counsel shall serve dispositive motions within 60 days of the filing of the note of issue (*see* CPLR 3212).  
 Such motions shall neither be returnable on nor adjourned to a date that is less than 60 days before trial.
- 7) A **compliance conference** is scheduled for \_\_\_\_\_.
- 8) A conference is required prior to submission of any discovery motion(s).
- 9) Further directive(s) \_\_\_\_\_

**No scheduled deadline may be extended without the Court's prior approval, which approval must be reduced to writing. The parties may not, without such approval, stipulate to any extensions of the dates set forth herein.**

\_\_\_\_\_  
 (Plaintiff Counsel - sign and print name)

\_\_\_\_\_  
 (Defendant Counsel - sign and print name)