

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT IN AND FOR  
MIAMI-DADE COUNTY, FLORIDA

IN RE: CHAMPLAIN TOWERS SOUTH  
COLLAPSE LITIGATION,

CLASS REPRESENTATION

CASE NO: 2021-015089-CA-01  
\_\_\_\_\_ /

COMPLEX BUSINESS  
LITIGATION DIVISION

**NOTICE OF FILING CASE MANAGEMENT SCHEDULE**

The Parties jointly file a Proposed Case Management Schedule, attached as Exhibit A. The Parties met and conferred, and while they agree on many of the proposed dates, there remains disagreement regarding several deadlines. As indicated on the chart, Plaintiffs' proposed deadlines are in the first column, and Defendants' proposed deadlines are in the second column. We have also noted the instances where there are additional differences among the Parties.

*[attorney signature on following page]*

Dated: January 14, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished, either via transmission of Notices of Service of Court Document generated by the E-Portal or in some other authorized manner for those counsel or parties who are excused from e-mail service on this 14th day of January 2022.

          /s/ David Weinstein  
Counsel

Description	Plaintiffs' Proposal	Defendants' Proposal
Plaintiffs' Motion for Class Certification	<a href="#">January [date TBD], 2022[1]</a>	See below
Defendants' Response to Motion for Class Certification	4 weeks from date of service of Motion	See below
Plaintiffs' Reply on Motion for Class Certification	2 weeks from date of service of Response	See below
Exchange of Initial Witness Lists Pursuant to CBL Rule 5.1-1(d)	1/28/2022	1/28/2022
Plaintiffs' Responses to Motions to Dismiss	1/26/2022	1/26/2022
Defendants' Replies on Motions to Dismiss*	2/3/2022	2/3/2022
Hearing (if held) on Motions to Dismiss	2/4/2022	2/4/2022
Cross-Defendants' Answers or Motions to Dismiss	1/19/2022	1/19/2022
Cross-Claimant's Responses to Motions to Dismiss	2/9/2022	2/9/2022
Cross-Defendants' Replies on Motions to Dismiss	2/16/2022	2/16/2022
Deadline for Amending Pleadings and Adding Parties	3/7/2022	3/7/2022
Fact Discovery Cut-Off	9/30/2022	See below
Plaintiffs' Motion for Class Certification	<a href="#">See above</a>	8/12/2022
Defendants' Response to Motion for Class Certification	See above	9/9/2022
Plaintiffs' Reply on Motion for Class Certification	See above	9/23/2022
Expert Witnesses Disclosures Pursuant to CBL Rule 6.3**	10/14/2022	N/A
Expert Witness Disclosures for Opinions Supporting Affirmative Claims	N/A	10/14/2022
Early Mediation Completed by	No later than 10/28/2022	No later than 10/28/2022
All Other Expert (non-rebuttal) Disclosures	N/A	12/12/2022
All Rebuttal Expert Disclosures	11/4/2022	12/23/2022
Expert Discovery Cut-Off	12/16/2022	1/6/2023
Fact Discovery Cut-Off	See above	1/6/2023
Deadline for Filing of Daubert Motions	1/30/2023	1/30/2023
Deadline for Filing of Dispositive Motions	1/30/2023	1/30/2023
Deadline for Final Mediation	2/13/2023	2/13/2023
Deadline for Filing Motions in Limine	2/27/2023	2/27/2023
Final Pre-Trial Conference	March 13 & 14, 2023	March 13 & 14, 2023
JURY TRIAL DATE	3/27/2023	3/27/2023

[1] Defendant Morabito Consultants, Inc. does not object to Plaintiffs' proposal on deadlines for Plaintiffs' Motion for Class Certification.

\* As to Becker, the reply will be due on February 14, with the hearing to be set by the Court.

\*\* The Receiver agrees with Plaintiffs' proposed expert disclosure deadlines.