

APPENDIX (1)

SUPREME COURT COUNTY OF NASSAU
IAS JUSTICE HON. Adams

PRESENT:

INDEX NO. 9471/11

Osmanzai, et al.

Plaintiff(s),

against

Save My Home Corp., et al

Defendant(s).

Preliminary Conference

Stipulation and Order

(sections 202.8 and 202.12 & 202.19
of the Uniform Rules)

Complet

(All items on the form must be completed unless inapplicable.)

It is hereby STIPULATED and ORDERED that disclosure shall proceed as follows: all parties

(1) **Insurance Coverage (CPLR 3101 (f))** If not already provided, shall be furnished by per CPLR
on or before per CPLR.

(2) **Bill of Particulars:**

(a) Demand for a bill of particulars shall be served by all parties on or before 10/11/11.

(b) Bill of particulars shall be served by all parties on or before 11/18/11.

(3) **Medical Report and Authorizations:**

Shall be served as follows: per CPLR

(4) **Physical Examination:**

(a) Examination of per CPLR shall be held _____

(b) A copy of the physician's report shall be furnished to plaintiff(s) within per CPLR days of
the examination.

(5) **Depositions: Choose (a) or (b) - Do not use both**

(a) Deponent	Date and Time	Place
_____	_____	_____
_____	_____	_____
_____	_____	_____

(b) The parties shall set forth a schedule for depositions to be held no later than all depositions
and shall provide the court with the schedule. not by 2/21/12

(Attach additional sheet if necessary)

2-15-12

Optional: ☐

If one deposition fails to take place as scheduled, the remaining parties' depositions shall nonetheless proceed as scheduled, except that priorities between defendants and plaintiffs shall be preserved.

(6) **Other Disclosure:**

(a) All parties, on or before 12/1/11, shall exchange names and addresses of all eyewitnesses and notice witnesses, statements of opposing parties and photographs, or, if none, provide an affirmation to that effect.

(b) Authorizations for plaintiff(s) employment records for the period per CPLR shall be furnished on or before per CPLR.

(c) Demand for discovery and inspection shall be served by all parties on or before 12/9/11. The items sought shall be produced to the extent not objected to, and objections, if any, shall be stated on or before 1/9/12.

(d) Accident reports prepared in the regular course of business shall be exchanged pursuant to CPLR 3101(g) by per CPLR.

(e) Other (interrogatories (CPLR 3130, 3101 (d) Etc.):

per CPLR

All such disclosure, unless otherwise noted herein, shall be completed by per CPLR

(f) Plaintiff shall provide authorizations for the following collateral source providers (CPLR 4545) within 45 days: insurance or other sources

(7) The parties shall ensure that a stipulation of discontinuance shall be promptly filed if the case settles before the next meeting with the Court. Failure to comply with any of these directions may result in the imposition of costs or sanctions or other action authorized by law.

(8) **Motion:** any dispositive motions(s) (CPLR 3211 and 3212) shall be made on or before 90 days of NOI.

(9) **Impleader Motion(s)** to amend the pleadings or to add parties: Shall be completed on or before 30 days after EBT's

(10) **End Date for all Disclosure** 6/21/12

(11) **Compliance/Certification Conference** shall be held on 2-16-12 9:30 Am (To be set by clerk)

I. Affirmation of Injuries: (if applicable)

The most serious injury alleged in this action is :

Monetary damages

(12) PRIOR TO MAKING ANY MOTION RELATING TO THE DIRECTIVES OF THIS ORDER OR ANY OTHER DISCOVERY RELATED ISSUE, MOVANT **MUST** CONTACT THE DCM DEPT. FOR POSSIBLE RESOLUTION BY CONFERENCE OR OTHERWISE. SUMMARY JUDGMENT MOTIONS MADE PRIOR TO THE FILING OF A NOTE OF ISSUE, DOES NOT AUTOMATICALLY STAY DISCOVERY PURSUANT TO CPLR 3214

- (13) ORDERED, that all parties shall provide upon request of another party additional authorizations for production of records maintained by health care providers and/or facilities.

Attorney for Plaintiff(s) All Plaintiffs
[Signature]

Attorney for Plaintiff(s) _____

Attorney for Defendant(s) KALOSTEIN & Telesheva
[Signature]

Attorney for Defendant(s) Singh + Menon
[Signature]

Attorney for Defendant(s) Della Monica
[Signature] for Joseph Guadana

Attorney for Defendant(s) _____

SO ORDERED

Dated: 9/23/11

J.S.C.

_____ vs. _____

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Pre-Note Milestone Deadline Chart

RJI FILED >>>>> 06/27/11

	<u>Expedited</u>	<u>Standard</u>	<u>Complex</u>
PC Deadline	08/11/11	08/11/11	08/11/11
Comp. Conf. by	10/10/11	12/24/11	02/22/12
Cert. Conf. by	11/24/11	03/23/12	06/21/12
NOI Due	02/22/12	06/21/12	09/19/12

MEDIATION AFTER FILING OF NOI

Line 10 date is:	11/24/11	03/23/12	06/21/12
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PC Instructions

- * Line 10 *is* cert. conf. date
- * Line 8 write "90 days from NOI filing"
- * Line 9 is 30 days from EBT's

*** you MUST see case management coordinator for the compliance conference date (per Judge's schedule)

*** **NOTE: Non-compliance with the PC Directives may result in a sanction hearing or other judicial action.**