**Example Directions**

Early in the claim the parties should discuss and agree a timetable of steps necessary to progress the claim to trial. Following are examples of the steps the parties may decide to include in that timetable:

**Pleadings and issues**

1. By 4.00pm on (insert date) the Plaintiff file and serve an Amended Statement of Claim.
2. By 4.00pm on (insert date) the Defendant file and serve an Amended Defence.
3. By 4.00pm on (insert date) the Plaintiff file and serve an Amended Reply.
4. By 4.00pm on (insert date) the Plaintiff and/or Defendant make any request for further and better particulars.
5. By 4.00pm on (insert date) the Plaintiff and/or Defendant respond to any request for further and better particulars.
6. By 4.00pm on (insert date) the parties confer for the purpose of resolving or narrowing the issues in dispute, identifying the real issues that remain in dispute and agreeing steps for the just and expeditious resolution of those issues at a minimum of expense.
7. By 4.00pm on (insert date) the parties prepare a draft List of Issues and submit the draft List to the Resolution Registrar by email.

**Documents and disclosure**

1. By 4.00pm on (insert date) the parties confer and agree directions in relation to documents, including, if appropriate, directions that will:
   1. provide for the early identification and exchange of critical documents, being a limited number of documents that are likely to be tendered at any trial and are likely to have a decisive effect on the resolution of the matter;
   2. require each party to inform the other parties in a concise written statement of the extent of the searches for documents that they propose to undertake, or have undertaken.
   3. defer disclosure until the real issues in dispute are identified;
   4. limit disclosure to specified documents or classes of documents;
   5. reflect a practical, cost-effective and proportionate Document Plan;
   6. facilitate any trial being conducted in accordance with the Supreme Court’s e-trial program.
2. By 4.00pm on (insert date) the parties submit proposed directions in relation to documents to the Resolution Registrar by email.

**Expert Evidence (if any)**

1. By 4.00pm on (insert date) the parties agree on the appointment of a joint expert witness or, failing such agreement, the plaintiff file an application for the appointment of a joint expert.
2. By 4.00pm on (insert date) the experts in the same field of expertise meet to identify the matters on which they agree, the matters on which they disagree and the reasons why, attempt to resolve any disagreement and prepare a joint report.
3. By 4.00pm on (insert date) the Plaintiff file the joint expert report(s).
4. By 4.00pm on (insert date) the parties formulate directions for the mediation of the matters in dispute in the proceeding and file a consent order for mediation, with such mediation to be completed by (insert time and date).
5. By 4.00pm on (insert date) the parties advise the Resolution Registrar by email of the success or otherwise of the mediation.

**Trial Plan**

1. By 4.00pm on (insert date), and in the event the mediation referred to in paragraph xx of this order is unsuccessful, the parties confer and prepare a draft plan for the trial of the proceeding, which plan contains the estimated duration of openings; the estimated duration of each witness’ evidence; the sequence in which witnesses will be called; the calling of expert witnesses (if any); the calling of witnesses by telephone or video-link; the estimated duration of submissions and the estimated duration of the trial.
2. By 4.00pm on (insert date) the parties submit the draft Trial Plan to the Resolution Registrar by email.
3. By 4.00pm on (insert date), and in the event the mediation referred to in paragraph xx of this order is unsuccessful, the parties sign and file a Request for Trial Date.