

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA
ex rel. PAUL PIETSCHNER,

Plaintiff,

v.

KATHRYN PETRALIA;
ROBERT FROHWEIN; and
SPENCER ROBINSON,

Defendants.

Civil Action No.: 4:21-cv-110-SDJ

PROPOSED SCHEDULING ORDER

Event	Standard Deadline	United States' Proposal	Defendants' Proposal
Rule 26(f) attorney conference	On or before April 16, 2025	On or before April 16, 2025	On or before April 16, 2025
Deadline to complete initial mandatory disclosures	April 28, 2025	April 28, 2025	April 28, 2025
Deadline to file joint report of attorney conference	May 2, 2025	May 2, 2025	May 2, 2025
Rule 16 management conference at 10:00am at the United States Courthouse, 7940 Preston Road, Plano, Texas 75024	May 28, 2025	May 28, 2025	May 28, 2025
Deadline for motions to transfer	July 4, 2025	June 4, 2025	June 25, 2025
Deadline to add parties	July 9, 2025	July 9, 2025	July 30, 2025
Deadline to assert advice of counsel defense	<i>(not specified)</i>	December 4, 2025	none

Event	Standard Deadline	United States' Proposal	Defendants' Proposal
Deadline for fact discovery	<i>(not specified)</i>	June 4, 2026	January 31, 2026
Disclosure of expert testimony pursuant to FED. R. CIV. P. 26(a)(2) and Local Rule CV-26(b) (both sides).	August 6, 2025 and September 3, 2025	July 16, 2026 (all parties' initial expert reports)	February 10, 2026 (all parties' initial expert reports)
Deadline for Plaintiff to file amended pleading. (A motion for leave to amend is required.)	August 20, 2025	July 30, 2026	February 24, 2026
Disclosure of rebuttal expert testimony pursuant to FED. R. CIV. P. 26(a)(2) and Local Rule CV-26(b) (both sides) .	(not specified)	September 10, 2026	March 10, 2026
Deadline for Defendant's final amended pleadings. (A motion for leave to amend is required.)	September 3, 2025	August 15, 2026	March 10, 2026
Deadline for expert discovery	November 12, 2025 (all discovery)	October 10, 2026	May 11, 2026
Deadline to object to expert testimony on for both parties. Objection shall be made as a motion to strike or limit expert testimony and shall be accompanied by a copy of the expert's report in order to provide the Court with all the information necessary to make a ruling on any objection.	September 17, 2025 and October 1, 2025	November 1, 2026 (all parties)	June 8, 2026 (all parties)
Deadline by which the parties shall notify the Court of the name, address, and telephone number of the agreed-upon mediator, or request that the Court select a mediator, if they are unable to agree on one.	October 29, 2025	November 1, 2026	June 11, 2026

Event	Standard Deadline	United States' Proposal	Defendants' Proposal
Deadline for motions to dismiss, motions for summary judgement, or other dispositive motions.	December 3, 2025	November 20, 2026	June 30, 2026
Mediation must occur by this date.	December 10, 2025	January 31, 2027	July 20, 2026
Deadline for responses to motions to dismiss, motions for summary judgement, or other dispositive motions	<i>(not specified)</i>	January 31, 2027	August 31, 2026
Notice of intent to offer certified records. Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order and Joint Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in non-jury cases).	April 1, 2026	February 19, 2027	September 8, 2026
Video Deposition Designation due. Each party who proposes to offer a deposition by video shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and requesting cross examination line and page numbers to be included. Counsel must consult on any objections and only those which cannot be resolved shall be presented to the Court. The party who filed the initial Video Deposition Designation is responsible for preparation of the final edited video in accordance	April 8, 2026	February 26, 2027	September 15, 2026

Event	Standard Deadline	United States' Proposal	Defendants' Proposal
with all parties' designations and the Court's rulings on objections.			
Motions in limine due.	April 13, 2026	March 2, 2027	September 18, 2026
File Joint Final Pretrial Order. See http://www.txed.uscourts.gov/?q=forms/misc	April 13, 2026	March 2, 2027	September 18, 2026
Response to motions in limine due. File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend deadline to object to expert witnesses.) File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law). Filed Proposed Voir Dire Questions.	April 29, 2026	March 19, 2027	October 9, 2026
If numerous objections are filed, the Court may set a hearing to consider all pending motions and objections.	Date will be set by Court. Usually within 10 days prior to final pretrial conf.	Date will be set by Court. Usually within 10 days prior to final pretrial conf.	Date will be set by Court. Usually within 10 days prior to final pretrial conf.
Final Pretrial Conference at 9:00 a.m. at the United States Courthouse located at 7940 Preston Road, Plano, Texas 75024. Parties should be prepared to try case. All cases on the Court's Final Pretrial Conference docket for this day have been set at 9:00 a.m. However, prior to the Final Pretrial Conference date, the Court will set a specific time between 9:00 a.m. and 4:00 p.m. for each case,	May 13, 2026	April 2, 2027	October 30, 2026

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depending on which cases remain on the Court's docket.			
10:00 a.m. jury selection and trial (or bench trial) at the United States Courthouse located at 7940 Preston Road, Plano, Texas 75024. Cases that remain for trial following the Court's Pretrial docket will be tried between June 1, 2026, and June 30, 2026. A specific trial date in this time frame will be selected at the Final Pretrial Conference.	June 1, 2026- June 30, 2026	April 5, 2027 – April 23, 2027 (3 weeks)	November 2, 2026 – November 20, 2026 (3 weeks)