

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

KIRK KEEPING

Plaintiff

- and -

HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF ONTARIO

Defendant

Keeping: Amended Litigation Timetable

Step	Deadline
Parties to finalize discovery plan by	Completed
Defendant to produce first round of documents by	Completed
Plaintiffs affidavit of documents to be served by	Completed

Defendant to produce second round of documents by	Completed
Defendant to produce all remaining relevant documents by	April 9, 2021
Plaintiff to serve motion record re: replacing representative plaintiff	April 23, 2021
Defendant to conduct cross-examinations and/or serve responding record if necessary	May 21, 2021
Plaintiff to serve factum re: replacing representative plaintiff	June 4, 2021
Defendant to serve responding factum re: replacing representative plaintiff	June 18, 2021
Plaintiff to serve reply factum re: replacing representative plaintiff	June 25, 2021
Hearing re: replacing representative plaintiff	July 2021
Examinations for discovery of the parties to be completed by	September 20, 2021
Answers to undertakings from discoveries to be delivered by	December 13, 2021

Motions arising from examinations to be heard by	February 28, 2022
Re-attendances at examinations for discovery, if any, to be conducted by	April 18, 2022
Plaintiff to deliver expert reports by	June 13, 2022
Defendant to deliver responding expert reports by	August 15, 2022
Plaintiff to deliver reply expert reports, if any, by	September 12, 2022
Mediation	October - November, 2022
Pre-trial conference	December 30, 2022
Trial	February 2023