



Dialogue Project Management™

Workplan	Estimates	Team
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Client: Sample Defendant-Side Litigation Matter

Matter:

Date:

Equity Partner Associate

Phase	Task	Assumptions / Status	Time	Fees	
TOTAL:			0.0 hrs	- \$	0.0 hrs 0.0 hrs
Preliminary Fact Gathering and Legal Analysis			0.0 hrs	- \$	
	Conduct case analysis and provide preliminary factual and legal assessment to client		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Identify key client personnel and custodians for interviews for facts and documents		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Identify key factual issues for interviews & preparation of memorandum for document collection		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Conduct initial discussions with key personnel		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Consider preliminary motions (e.g.: motion to determine issue before trial; motion for summary trial; particulars, etc.)		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Consider legal issues and related legal research		0.0 hrs	- \$	0.0 hrs 0.0 hrs
Pleadings			0.0 hrs	- \$	
	Review Statement of Claim		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Research claim/defences		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Draft Defence (and Counterclaim)		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Discuss draft Defence (and Counterclaim) with client		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Finalize the Defence (and Counterclaim)		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Review the Reply (if any)		0.0 hrs	- \$	0.0 hrs 0.0 hrs
Document Discovery			0.0 hrs	- \$	
	Develop document collection/retention strategy		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Liase with litigation support re: document collection; collect client documents and request other side's documents; review key documents; gather Affidavit of Documents and productions; review other side's productions		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Preliminary review key documents		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Finalize client personnel and custodian interview list		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Prepare for and conduct client personnel and custodian interviews for facts and documents		0.0 hrs	- \$	0.0 hrs 0.0 hrs
Oral Discoveries/Examinations for Discovery			0.0 hrs	- \$	
	Prepare witnesses for examinations for discovery		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Prepare for examinations for discovery		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Attend examinations for discovery		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Review transcripts		0.0 hrs	- \$	0.0 hrs 0.0 hrs



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	Answer undertakings		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Consider motions arising from undertakings and refusals		0.0 hrs	- \$	0.0 hrs	0.0 hrs
Experts			0.0 hrs	- \$		
	Make decision re: areas for expert evidence		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Identify and retain experts		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Discussions with experts		0.0 hrs	- \$	0.0 hrs	0.0 hrs
Case Management			0.0 hrs	- \$		
	Discuss proposed timetable with opposing counsel		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Attend case management conferences		0.0 hrs	- \$	0.0 hrs	0.0 hrs
Settlement Efforts			0.0 hrs	- \$		
	Discuss prospects of settlement with client		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Conduct settlement discussions with other side		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Draft settlement offer		0.0 hrs	- \$	0.0 hrs	0.0 hrs
Mandatory Mediation/Settlement Conference			0.0 hrs	- \$		
	Select Mediator		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Prepare Statement of Issues		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Review opposing party(s) Statements(s) of Issues		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Prepare for mediation		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Attend mediation		0.0 hrs	- \$	0.0 hrs	0.0 hrs
Pre-Trial			0.0 hrs	- \$		
	Discuss trial dates with opposing counsel		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Prepare and file trial record		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Prepare and finalize expert reports		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Set matter down for trial		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Consider serving Offer to Settle		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Prepare for Pre-Trial/Trial Management Conference		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Draft Pre-Trial Memorandum/Trial Brief		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Review opposing party(s) Pre-Trial Memoranda		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Discuss above with client		0.0 hrs	- \$	0.0 hrs	0.0 hrs
	Attend pre-trial conference		0.0 hrs	- \$	0.0 hrs	0.0 hrs
Trial Preparation			0.0 hrs	- \$		



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	Discuss trial strategy		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Prepare Joint Brief of Documents/Exhibits List		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Meet with witnesses and experts to prepare them for trial		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Research outstanding legal issues		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Prepare and review read-ins		0.0 hrs	- \$	0.0 hrs 0.0 hrs
Trial			0.0 hrs	- \$	
	Prepare opening argument		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Prepare direct and cross-examinations		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Attend at trial		0.0 hrs	- \$	0.0 hrs 0.0 hrs
	Prepare closing arguments		0.0 hrs	- \$	0.0 hrs 0.0 hrs