

Form 10

Para 81(1)

Proposed Case Management Plan

[Title as in cause or matter]

[PLAINTIFF'S/DEFENDANT'S] PROPOSED CASE MANAGEMENT PLAN

The [Plaintiff/Defendant] hereby sets out his/her proposed Case Management Plan for the conduct of [case number] as follows:

[To state response in **bold** immediately after every question]

List of Factual, Legal & Technical Issues

1. Have you discussed the factual, legal and technical issues with opposing counsel?
 - a. If yes, please categorise the issues according to “Agreed Factual/Legal/Technical Issues” and consolidate the issues into a document entitled “List of Issues” for discussion at the Case Management Conference (“CMC”). Please also see Q2 below.
 - b. If not, please take the necessary steps to meet and confer with opposing counsel on parties’ respective lists of issues with the objective of preparing a list of factual, legal and technical issues. This should take place before the CMC. Please also see Q2 below.
2. Have you furnished a “List of Issues” to the SICC Registry at least 7 clear working days prior to the first CMC?

Adoption of protocols

2A. Do the parties intend to adopt any of the protocols set out at Appendix F of these Practice Directions? If so, please specify which and whether the parties intend to modify the protocols in any way.

Pleadings

3. Do you intend to amend any pleadings or make a request for particulars? If yes, please state briefly:
 - a. What amendments will be made to the pleadings and when can the draft amendment(s) be furnished to the other parties?
 - b. What requests for particulars will be made and when can the request for particulars be served on the other parties?
- 3A. Are the pleadings complex or voluminous? If yes, please state:
 - a. Whether a summary of pleadings with appropriate cross-references to the relevant paragraphs in the pleadings, or alternatively, a memorial-style brief, which may

include a summary of the pleadings, the salient points of evidence and the applicable law, will assist the Court.

- b. What directions in relation to form, contents and page limit, if any, are being sought from the Court.
4. Are there any outstanding requests for particulars? If yes, please provide brief details of the outstanding requests and when a response can be expected.

Interlocutory Applications

5. Do you intend to make any applications between now and 4 weeks after the date of the CMC? If yes, what are the intended interlocutory applications and when can they be filed?
6. Have you informed your opposing counsel about your intended interlocutory applications? If yes, what was opposing counsel's response?

Production of Documents

If parties have not completed providing to the Court and all parties documents on which each party relies pursuant to Order 110 rule 14(1):

7. When can you expect to provide to Court and to all parties documents on which you rely?
- 7A. Whether affidavits of evidence-in-chief should be exchanged prior to discovery and/or the production of documents?

If parties have complied with Order 110 rule 14(1):

8. Do you expect to serve a request to produce pursuant to Order 110 r 15(1) and if so, when will you serve the request to produce and how much time do you expect the opposing party will require to produce the documents?
9. Have you been served with a request to produce? If so, are you objecting to the request to produce? If you are objecting, when can you serve the notice of objection? If not, when can you produce the documents?
10. Have you been served with a notice of objection pursuant to Order 110 r 16(1)? If so, when will you be filing the application to the Court for documents to be produced?

Witnesses

Factual Witnesses

11. How many witnesses of fact do you propose to call to give evidence at trial? Please state the name of each witness and briefly describe the facts to which the witness will attest to.
12. Will an interpreter be required for any of the witnesses listed in Q11 above? If yes, please state which language the witness will be giving evidence in. You are reminded to make the necessary arrangements for interpreters at trial.
13. If you are unable to give the name of any of the witnesses, please explain why.

Experts

14. Do you wish to adduce expert evidence at the trial? If yes:
 - a. Are parties able to agree on having a single Court expert to give expert evidence?
 - b. If your answer to Q14a. is in the negative, how many expert witnesses do you propose to rely on at trial?

- c. Please give the names of each expert and identify the expert's field of expertise.
- d. If you are unable to give the expert's/experts' names, please explain why.
- e. Please state whether the parties have any objections to any other parties' individual expert witnesses and if so, the grounds on which the objections are being made.

15. Has the expert(s) named in Q14 above prepared a report?
- a. If yes, has that report been served on the other party/parties?
 - b. If not, when can the expert's/experts' reports be served on the other party/parties?
16. When will your expert(s) named in Q14 above be available for a meeting of the experts? Please confer with opposing counsel to propose a range of dates for the meeting of the experts and/or joint inspection.
17. Is this a suitable case for a joint expert, amicus curiae and/or assessor to be appointed for any particular issue/field?
- a. If yes, please state name(s) of the joint expert(s), amicus curiae and/or assessor(s) whom parties propose to use and attach their curriculum vitae.
 - b. If not, please explain.
18. Is this a suitable case to employ the concurrent evidence procedure at the trial? Please explain why.

Factual and Expert Witnesses – Video Link

19. Will any of the factual or expert witnesses be required to give evidence via video link? If yes, please state the names of the witness(es) who will be giving evidence via video link and when you propose to take out the relevant application for evidence to be given in such a manner.

Evidence

20. Do you intend to make an application to disapply the Evidence Act (Cap. 97) and to substitute other rules of evidence (and, in particular, whether you wish to make an application for the matter to be determined by reference to documentary evidence only, without the examination of witnesses in open Court)?

Questions of Foreign Law

21. Are there any questions of foreign law involved in the case?
22. If so, do you intend to make an application for questions of foreign law to be determined on the basis of submissions instead of proof?

Confidentiality Orders

23. Do you intend to make an application to seek any confidentiality orders for the proceedings?

Trial

24. How long do you estimate the trial or final hearing will take? You may provide a range of days, if appropriate.
25. What is the earliest date by which you believe you can be ready for trial?

26. Do you intend to make a request for the trial to be heard by a panel of three trial Judges instead of one trial Judge?
27. Do you intend to apply to bifurcate the trial? If yes, what are your grounds?

Costs

28. What is your estimate of your costs incurred to date?
29. What do you estimate your overall costs will likely to be in the event that the matter proceeds to trial?

Any Other Issues

30. Apart from the questions listed above, are there any other issues or concerns that you wish to highlight to the Court and/or opposing counsel? If yes, please state these issues briefly and how you propose for them to be addressed.

Settlement and Alternative Dispute Resolution (“ADR”)

31. Have parties attempted mediation or any other form of ADR prior to the commencement of this action? If yes, please provide brief details of when this was done and why litigation remains necessary.
32. Are parties contemplating settlement through mediation or any other form of ADR?
If yes, please indicate:
 - a. Whether parties have agreed to proceed for mediation or any other form of ADR.
 - b. When the proposed date of mediation or any other form of ADR would be.
 - c. Whether parties require any directions on how they should proceed to mediation or any other form of ADR.

If no, please state why mediation or any other form of ADR will not be appropriate.

Dated this day of , 20 .

[The Plaintiff/Defendant or the Counsel for the Plaintiff/Defendant as the case may be]