✓ File Progress Plan

**Name of file: File No.:**

**Responsible lawyer(s) & staff:**

**Last updated (date): To be updated next (date):**

**Date of loss: Dismissal date:**

**Theory of liability & strength of case:**

**Theory of damages: Estimated quantum:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Step (**Modify steps below as necessary**.)** | **Date To Be Completed** | **Actual Date Completed** | **Who** | **Notes** |
| Obtain authorizations and directions |  |  |  |  |
| Request 3rd party documents (e.g., OHIP summary) |  |  |  |  |
| Diarize limitation periods, dismissal date, and 30 day deadline to bring status hearing motion |  |  |  |  |
| Investigate claim (order searches, order records, retain experts) |  |  |  |  |
| Identify all defendants |  |  |  |  |
| Serve notice letters |  |  |  |  |
| Issue Statement of Claim |  |  |  |  |
| Statement of Claim properly served |  |  |  |  |
| Statement(s) of Defence received (or defendants noted in default) |  |  |  |  |
| Discovery plan |  |  |  |  |
| Affidavit of documents |  |  |  |  |
| Discoveries |  |  |  |  |
| Answer undertakings |  |  |  |  |
| Motions |  |  |  |  |
| Client meeting |  |  |  |  |
| Retain further experts |  |  |  |  |
| Mediation & prep |  |  |  |  |
| Set action down for trial |  |  |  |  |
| Trial & prep |  |  |  |  |

This document may be adapted for use by lawyers and paralegals for their legal practices.

An electronic copy of this document is available at [practicepro.ca/Rule48](http://practicepro.ca/Rule48)