

## NRCP 16.2 Timeline (Detailed FDF and Complex Divorce Litigation Procedures)

<b>Filing of Summons and Complaint</b>	<b><u>UPON FILING COMPLAINT OR ANSWER</u></b> ----- Plaintiff or Defendant may file <i>Request to Opt-In to Detailed FDF and Complex Divorce Litigation Procedures</i> . NRCP 16.2(b)(2). The criteria to invoke Detailed FDF and Complex Divorce Litigation Procedures are: (1) either spouse's or domestic partner's GMI, or combined income is greater than \$250,000 per year; OR (2) either spouse or domestic partner is self-employed, or the owner, partner, managing shareholder, or managing member of a business; OR (3) the combined gross value of assets owned individually or collectively is greater than \$1,000,000.						
	<b><u>30 DAYS AFTER SERVICE OF ANSWER TO COMPLAINT</u></b> ----- Formal discovery commences pursuant to NRCP 16.2(b)(2)(iv)						
	<b><u>WITHIN 45 DAYS AFTER SERVICE OF REQUEST TO OPT-IN TO DETAILED FDF AND COMPLEX DIVORCE LITIGATION PROCEDURES</u></b> ----- Parties must file and serve Detailed FDF <i>and</i> initial disclosures. NRCP 16.2(b). Under NRCP 16.2(b)(3), party <i>must</i> , without awaiting discovery request, provide to other spouse all evidence supporting each line item of FDF and evidence of property, income, and earnings of both spouses – <b>ALL THIS HAS TO BE DONE IN SAME TIME FRAME AS FILING OF DETAILED FDF</b>						
	<b><u>NEW FINANCIAL INFORMATION</u></b> ----- Must be updated within 14 days of acquiring the new information. NRCP 16.2(b)(2)(iii); HOWEVER, if a hearing, deposition, CMC, or other calendared event is scheduled less than 14 days from the discovery date, then the update must be filed within 24 hours of the discovery of the new information.						
	<b><u>WITHIN 21 DAYS OF RECEIVING DISCOVERY</u></b> ----- Must make written objection to <i>authenticity</i> or <i>genuineness</i> of document. NRCP 16.2(b)(2)(vii). Failure to make written objection presumes documents are authentic and genuine and that they shall not be excluded from evidence on those grounds.						
	<b><u>WITHIN 90 DAYS AFTER FILING DETAILED FDF</u></b> ----- Disclosure of expert witness must be made. NRCP 16.2(b)(4).						
	<b><u>WITHIN 21 DAYS AFTER DISCLOSURE OF EXPERT WITNESS</u></b> ----- Disclosure of rebuttal expert witness must be made. NRCP 16.2(b)(4).						
	<b><u>90-120 DAYS AFTER FILING ANSWER</u></b> ----- Case Management Conference must be held. NRCP 16.2(c)(1).						
	<b><u>10 DAYS PRIOR TO CMC</u></b> ----- Each party must file and serve a proposed Complex Divorce Litigation Plan. The Plan shall include any and all proposals concerning the time, manner, and place for needed discovery; proposed conference and anticipated hearings with the Court; and any other special arrangements focused on prompt settlement, trial, or resolution of the case. The court shall consider each party's proposed plan and issue a case management order.						
	<b><u>WITHIN 30 DAYS OF CMC, CMC ORDER SHALL BE ISSUED</u></b> ----- Containing the following information: (1) brief description of the action; (2) any changes to the timelines of 16.2; (3) deadline for close of discovery; (4) deadline beyond which the parties are excluded from filing motions to amend pleading or add parties absent court order; (5) deadline by which dispositive motions must be filed; (6) any other orders the court deems necessary during the pendency of the action, including interim custody, child support, maintenance, and NRS 125.040 orders. NRCP 16.2(d)(1)-(6).						
<b><u>10 DAYS AFTER CMC, ORDER SHALL BE SUBMITTED TO COURT</u></b> ----- If the Court orders one of the parties to prepare the foregoing CMC Order. NRCP 16.2(d).							
<b><u>60 DAYS PRIOR TO CLOSE OF DISCOVERY</u></b> ----- Expert report must be provided. NRCP 16.2(b)(4)(A).							
<b><u>PRETRIAL DISCLOSURES</u></b> <b><u>NRCP 16.2(b)(5)</u></b>	45 days before trial – disclosure of all non-expert witnesses.	----	21 days before trial – trial exhibits must be prepared and served.	----	Up until 5 days before trial – written objection to any exhibit may be filed.	----	<b>TRIAL</b>