

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
www.flmb.uscourts.gov

In re:

Case No. 8:24-bk-00676-RCT

THE CENTER FOR SPECIAL NEEDS
TRUST ADMINISTRATION, INC.,

Chapter 11

Debtor.

EVANSTON INSURANCE COMPANY,

Plaintiff,

v.

Adv. Pro No. 8:25-ap-00082-RCT

MICHAEL GOLDBERG, as Chapter 11
Trustee of the estate of Debtor, The Center
for Special Needs Trust Administration, Inc.,

Defendant.

Uniform Case Management Report

The goal of this case management report is to “secure the just, speedy, and inexpensive determination of” the action. *See* Fed. R. Civ. P. 1. Under Local Rule 3.02(a)(2), this case management report should be used in all civil cases except those described in Local Rule 3.02(d). Individual judges may have additional case management preferences that can be found under each judge’s name on the Court’s website, flmd.uscourts.gov/judges/all.

1. Date and Attendees

The parties may conduct the planning conference “in person, by telephone, or by comparable means[.]” *See* Local Rule 3.02(a)(1).

The parties conducted the planning conference on 7/2/2025. Megan W. Murray Esq. and Noah E. Snyder Esq. attended the conference.

2. Deadlines and Dates

The parties request these deadlines and dates:

Action or Event	Date
Deadline for moving for class certification, if applicable. <i>See</i> Fed. R. Civ. P. 23(c).	N/A
Deadline for providing mandatory initial disclosures. <i>See</i> Fed. R. Civ. P. 26(a)(1).	8/1/2025
Deadline for moving to join a party, <i>see</i> Fed. R. Civ. P. 14, 19, and 20, or amend the pleadings, <i>see</i> Fed. R. Civ. P. 15(a).	9/15/2025
Deadline for serving expert disclosures under Rule 26(a)(2), including any report required by Rule 26(a)(2)(B). <div>Plaintiff</div> <div>Defendant</div>	10/13/2025
	10/27/2025
Deadline for participating in mediation. <i>See</i> Local Rules, ch. 4.	11/1/2025
Deadline for serving expert disclosures under Rule 26(a)(2), including any report required by Rule 26(a)(2)(B). <div>Rebuttal</div>	11/3/2025
Deadline for completing discovery and filing any motion to compel discovery. <i>See</i> Fed. R. Civ. P. 37; <i>Middle District Discovery</i> (2021).	12/22/2025
Deadline for filing Motions for Summary Judgment	01/16/2026
Deadline for filing responses to Motions for Summary Judgment	02/06/2026
Date of the final pretrial meeting. <i>See</i> Local Rule 3.06(a).	N/A
Deadline for filing the joint final pretrial statement, any motion in limine, proposed jury instructions, and verdict form. <i>See</i> Local Rule 3.06(b). (Must be at least seven days before the final pretrial conference.)	N/A
Date of the final pretrial conference. <i>See</i> Fed. R. Civ. P. 16(e); Local Rule 3.06(b).	N/A
Month and year of the trial term.	N/A

The trial will last approximately 1 days and be

☐ jury.

☒ non-jury.

3. Description of the Action

Action regarding insurance coverage in adversary proceeding in a related Middle District Bankruptcy Case 24-bk-676-RTC. The current dispute concerns a declaratory action filed by an insurer against the named insured.

4. Disclosure Statement

☒ Each party has filed a [disclosure statement](#) using the required form.

5. Related Action

☒ The parties acknowledge their continuing duty under Local Rule 1.07(c) to notify the judge of a related action pending in the Middle District or elsewhere by filing a “Notice of a Related Action.” No notice need be filed if there are no related actions as defined by the rule.

6. Consent to a Magistrate Judge

“A United States magistrate judge in the Middle District can exercise the maximum authority and perform any duty permitted by the Constitution and other laws of the United States.” Local Rule 1.02(a). With the parties’ consent, a district judge can refer any civil matter to a magistrate judge for any or all proceedings, including a non-jury or jury trial. 28 U.S.C. § 636(c).

The Court asks the parties and counsel to consider the benefits to the parties and the Court of consenting to proceed before a magistrate judge. Consent can provide the parties certainty and flexibility in scheduling. Consent is voluntary, and a party for any reason can decide not to consent and continue before the district judge without adverse consequences. *See* Fed. R. Civ. P. 73(b)(2).

☐ The parties do consent and file with this case management report a completed Form AO 85 “Notice, Consent, and Reference of a Civil Action to a Magistrate Judge,” which is [available on the Court’s website](#) under “Forms.”

☒ The parties do not consent.

☒ The Parties consent to adjudication by the United States Bankruptcy Court, Middle District of Florida.

7. Preliminary Pretrial Conference

☒ The parties do not request a preliminary pretrial conference before the Court enters a scheduling order.

Discovery Practice

The parties should read the Middle District Discovery Handbook, available on the Court's website at flmd.uscourts.gov/civil-discovery-handbook, to understand discovery practice in this District.

☒ The parties confirm they will comply with their duty to confer with the opposing party in a good faith effort to resolve any discovery dispute before filing a motion. *See* Local Rule 3.01(g); *Middle District Discovery* (2021) at § I.A.2.

8. Discovery Plan

The parties submit the following discovery plan under Rule 26(f)(2):

A. The parties agree to the timing, form, or requirement for disclosures under Rule 26(a):

☒ Yes.

☐ No; instead, the parties agree to these changes: *enter changes*.

B. Discovery may be needed on these subjects: *Matters related to insurance policy MKLV2PEO001315 and coverage issues.*

C. Discovery should be conducted in phases:

☒ No.

☐ Yes; describe the suggested phases.

D. Are there issues about disclosure, discovery, or preservation of electronically stored information?

☒ No. **But the parties reserve the right to address ESI at a later date.**

☐ Yes; describe the issue(s).

E. ☒ The parties have considered privilege and work-product issues, including whether to ask the Court to include any agreement in an order under Federal Rule of Evidence 502(d).

9. Request for Special Handling

☒ The parties do not request special handling.

☐ The parties request special handling. Specifically, describe requested special handling.

☐ Enter party's name unilaterally requests special handling. Specifically, describe requested special handling.

10. Certification of familiarity with the Local Rules

☒ The parties certify that they have read and are familiar with the Court's Local Rules.

11. Signatures

Dated this 10th day of July, 2025

s/ Megan W. Murray
Megan W. Murray
Florida Bar Number 0093922
Daniel E. Etlinger
Florida Bar Number 0077420
UNDERWOOD MURRAY, P.A.
100 N Tampa Street, Suite 2325
Tampa, Florida 33602
Tel: (813) 540-8401
Email: mmurray@underwoodmurray.com
Special Counsel to the Trustee

s/ Noah E. Snyder
James M. Kaplan
Florida Bar Number 9210410
Noah E. Snyder
Florida Bar Number 1074154
KAPLAN ZEENA LLP
2 S. Biscayne Blvd., Suite 3050
Miami, FL 33131
Tel: (305) 530-0800
Email: james.kaplan@kaplanzeena.com
Email: elizabeth.salom@kaplanzeena.com
Email: noah.snyder@kaplanzeena.com
Email: maria.escobales@kaplaneena.com
Counsel for Evanston Insurance Company