

Instructions for Issue Conference in Dept. 32.

All parties are required to attend the Issue Conference in person.

At the time of the Issue Conference, each party must file and serve a TRIAL BRIEF with tabbed sections containing:

[1] **STATEMENT OF CASE TO BE READ TO JURY**

[2] **MOTIONS IN LIMINE AND THE OPPOSING PARTY'S ANSWERS TO YOUR MILs**

Motions in Limine are to be served on opposing party [not filed] 10 days in advance of issue conf; answers to MILs to be served 3 days in advance of issue conference. Each party's MILs and the responses thereto are to be included in a tabbed section of your trial binder.

[3] **WITNESS LIST** (name, city of residence, brief, generic description of testimony, anticipated length of testimony on direct examination)

[4] **ESTIMATE ON DAYS OF TRIAL NEEDED TO PRESENT YOUR PARTY'S CASE.** Assume court will in trial from 10:00 am to 4:30 pm each day, with at least one 15 minute break in the afternoon.

[5] **Whether or not you are providing a court reporter for the proceedings.**

[6] **EXHIBIT LIST.** Exhibits are to be listed in a Word Table with columns headed: NUMBER, DESCRIPTION OF DOC, NATURE OF ITEM (i.e., hard copy, electronic still shot, electronic audio, electronic video) and blank column labeled "IDENTIFIED" "ADMISSION STIPULATED" AND "ADMITTED"] Exhibit list to be submitted in both hard copy and electronically submitted to court as a Word Document. Exhibits themselves to be brought to court on day of trial, not to the Issue conference.

Counsel are to meet and confer regarding stipulations to the admission of each other's exhibits in advance of trial. Counsel must update the exhibit list to reflect the results of the meet and confer in the "Admission Stipulated" column of their Exhibit List and bring a hard copy and email an electronic copy to court on the day of trial.

[7] **STATEMENT ON WITNESS AVAILABILITY:**

Please note that the court conducts trials from Mondays through Thursdays only, unless jury is in deliberation. All witnesses are to be available throughout all days of trial forecast. Counsel must arrange to have witnesses ready to testify immediately after the conclusion of the current witness on the stand, so as to fill the court's time all day from 10:00 a.m. to 4:30 p.m. That is, if you believe a witness will finish before 4:00 p.m. you

must have a witness ready to begin testifying at 4:01 p.m. Failure to have the next witness ready or to be prepared to proceed with evidence will usually constitute resting.

Counsel must have a confirmed order of witnesses for the next fully court day.

Defense counsel is responsible for inquiring with Plaintiff's counsel as to estimating the end of Plaintiff's witness[es] testimony and have their witnesses ready to begin promptly thereafter.

Counsel must list any restrictions on a witness' anticipated availability and work with opposing counsel on stipulations for taking a witness out of order in order to accommodate these restrictions.

[8] STATEMENT ON NEED FOR FOREIGN LANGUAGE INTERPRETERS. List all parties and witnesses who will request or required assistance from a spoken language interpreter.

You must give the court notice if a **party** requires a spoken language interpreter and the language needed. Each party must provide a spoken language interpreter for its own **witnesses**. A spoken language interpreter must be found qualified by the court to serve as an interpreter. A family member cannot serve as a spoken language interpreter in Court.

[9] LIST OF JURY INSTRUCTIONS (CACI)

Parties are to submit a numbered list of requested CACI instructions, a hard copy of the printed instructions (excluding "Directions for Use" notes), and an electronic version of the printed instructions in Word.

[10] PROPOSED VERDICT FORM

Parties must submit a proposed verdict form both in hard copy and an electronic version in Word.