

**GENERAL ORDER – FINAL STATUS CONFERENCE
PERSONAL INJURY DEPARTMENTS
LOS ANGELES SUPERIOR COURT**

The date for Trial having been set in this matter, the COURT ORDERS AS FOLLOWS:

1. MEET AND CONFER

In preparation for the Final Status Conference, the parties shall meet and confer and jointly prepare the Trial Readiness Documents to be filed and lodged with the court. The parties shall also work to reach stipulations to ultimate facts, legal issues, motions in limine and the authenticity/admissibility of exhibits.

2. EXHIBIT BINDERS

The parties shall jointly prepare, and lodge at the Final Status Conference, three sets of tabbed, internally paginated and properly marked exhibits, organized numerically in three-ring binders (a set for the court, the Judicial Assistant and the witnesses). The parties shall mark non-documentary exhibits and insert a simple written description of the exhibit behind the corresponding numerical tab in the exhibit binder.

3. TRIAL READINESS DOCUMENTS

At least 5 calendar days prior to the Final Status Conference, the parties shall serve and file (in Room 102 of the Stanley Mosk Courthouse) the following Trial Readiness Documents:

A. TRIAL BRIEFS

Each party shall file a trial brief succinctly identifying:

- (1) the claims and defenses subject to litigation;
- (2) the major legal issues (with supporting points and authorities);
- (3) the relief claimed and calculation of damages sought; and
- (4) any other information that may assist the court at trial.

B. MOTIONS *IN LIMINE*

Before filing motions *in limine*, the parties shall comply with the statutory notice provisions of Code of Civil Procedure Section 1005 and the requirements of Local Rule 3.57(a). The caption of each motion *in limine* shall concisely identify the subject of the motion and designate the specific evidence sought to be precluded. Parties filing more than one motion *in limine* shall number them consecutively. Parties filing opposition papers shall identify, in the caption, the number of each motion to which it responds.

C. JOINT JURY STATEMENT

For jury trials only, the parties shall file a joint written statement of the case to be read to the jury. Local Rule 3.25(i)(4).

D. JOINT WITNESS LIST

The parties shall file a joint list of all witnesses that each party intends to call, (except for impeachment or rebuttal witnesses). Local Rule 3.25(i)(5). The joint witness list shall identify each witness by name, each expert witness, the expected length, in tenths of an hour, of the direct and cross examination of each witness, and any potential scheduling problems or special requirements. Any party who seeks to elicit testimony from a witness not identified on the joint witness list will have to make a showing of good cause.

E. JOINT EXHIBIT LIST

The parties shall prepare and file a joint exhibit list that includes columns identifying each exhibit offered without objection or specifying each party's evidentiary objections to its admission. To comply with Local Rules 3.52(i)(5) and 3.53, the parties shall meet and confer in an effort to resolve objections to the admissibility of each exhibit.

F. JOINT JURY INSTRUCTIONS

The parties shall prepare and file a complete set of full-text proposed jury instructions, editing CACI instructions to remove blanks and irrelevant material. The parties shall prepare special instructions in a format suitable for submission to the jury (placing citations of authority and the identity of the requesting party above the text pursuant to Local Rules 3.170 and 3.171).

G. JOINT VERDICT FORM

The parties shall prepare and jointly file a proposed general or special verdict form with interrogatories. If the parties cannot agree on a joint verdict form, each party must separately file a proposed verdict form. Local Rule 3.25(i)(7) and (8).

4. TRIAL READINESS BINDER

The parties shall jointly prepare and lodge, at the Final Status Conference, one set of tabbed 3-ring binders containing copies of the parties' Trial Readiness Documents. The parties shall organize motions in limine behind tabs identifying the moving, opposition and reply papers to each motion. The parties shall organize proposed jury instructions behind tabs separating (A) the parties' jointly approved jury instructions; (B) the proposed instructions that have elicited an objection; (C) any proposed special instructions; and (D) any agreed-upon special verdict form, or the competing proposed special verdict forms.

5. COMPLIANCE

The court has discretion to impose SANCTIONS for any party's failure, without good cause, to timely submit any item required in this order. The court's SANCTIONS may include monetary sanctions, exclusion of evidence, issue preclusion, denial of a claim or defense, dismissal and/or default.

Dated: March 18, 2013

Judge of the Superior Court