

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
LONG CAUSE TRIAL PACKAGE GUIDELINES**

Submission for Long Cause Trial determination must include copies of the following documents in a 3-ring binder:

Binder No. 1 (Must include Table of Contents and Tabs)

- Current Operative Pleadings
- Brief Statement of the Case
 - Must be:* 1. Joint Statement
 - 2. Signed by counsel for each party
- Joint Witness List (See Attachment 1)
 - Must have:* 1. Description of testimony
 - 2. Indication of which witnesses are actually expected to testify
 - 3. No witness named more than once
 - 4. Times listed
 - 5. Times added
 - 6. Signature of counsel for each party
- Joint Exhibit List (See Attachment 2)
 - Must have:* 1. All columns completed, except for columns F and G
 - 2. Signature of counsel for each party
- Trial Briefs
 - Must not be:* 1. Over 15 pages in length
- Special Verdicts

NOTE: There might not be any until the motions in limine are heard and ruled upon. If such is the case, place a sheet in the binder that so states.

Binder No. 2 (Must include Table of Contents and Tabs)

- Plaintiff's Motions in Limine
- A Local Rule **3.57** declaration for each motion **or** for all motions
- Indicate in the table of contents where the Local Rule **3.57** declaration is located in the binder

Binder No. 2 (Continued)

- Separate motions by numbered tabs. Immediately following each motion, place any corresponding opposition or reply.
- Separate the motion, any corresponding opposition, and any corresponding reply with colored paper or numbered tabs.

Binder No. 3 (Must include table of contents and tabs)

- Defendant's motions in limine
- Separate motions by numbered tabs. Immediately following each motion, place any corresponding opposition or reply.
- Separate the motion, any corresponding opposition, and any corresponding reply with colored paper or numbered tabs.

NOTE: If there are very few motions in limine as to one party or both, plaintiff's and defendant's motions in limine may be placed in one binder.

Jury Instructions (Do not three-hole punch and do not place in a binder)

- Must:*
1. Be separated into stacks (i.e., an agreed-upon stack; a stack, if any, of plaintiff's instructions to which defendant objects; and a stack, if any, of defendant's instructions to which plaintiff objects)
 2. Be labeled by post-its or otherwise
 3. Be perforated
 4. Have authorities placed above perforation
 5. Have boxes above perforation completed

JOINT WITNESS LIST – EXEMPLAR

The names of witnesses are to be listed alphabetically.
 The name of each witness is to be listed only once.
 A landscape format may be used, if necessary.
 The joint witness list is to be signed by counsel for each party.

NAME	PARTY CALLING	ACTUALLY EXPECTED TO TESTIFY	BRIEF DESCRIPTION OF TESTIMONY	LENGTH OF DX (IN HOURS)	LENGTH OF CX (IN HOURS)	SUB-TOTAL (IN HOURS)	TOTAL (IN HOURS)

TOTALS FOR WITNESSES WHO ARE ACTUALLY EXPECTED TO TESTIFY

<u>PLAINTIFF’S CASE</u>	(5.0 hrs)	<u>CROSS-COMPLAINANT’S CASE</u>	(0.75 hr)
Direct examination:	3.0 hrs	Direct examination:	0.05 hr
Cross examination:	2.0 hrs	Cross examination:	0.25 hr
<u>DEFENDANT’S CASE</u>	(2.5 hrs)	<u>CROSS-DEFENDANT’S CASE</u>	(0.75 hr)
Direct examination:	1.5 hrs	Direct examination:	0.50 hr
Cross examination:	1.0 hrs	Cross examination:	0.25 hr
<u>TOTAL TIME FOR PLAINTIFF’S ACTION</u>		<u>TOTAL TIME FOR CROSS-COMPLAINANT ACTION:</u>	1.50 hrs

GRAND TOTAL: 9.0 hrs

(i.e, the total time for all witnesses actually expected to testify)

**EXHIBIT LIST – TRIAL
Joint Submission Long Cause**

<u>A</u> Exhibit No.	<u>B</u> Description	<u>C</u> Offered by	<u>D</u> Authenticity Stipulated to?	<u>E</u> Admissibility Stipulated to?	<u>F</u> Date Identified	<u>G</u> Date Admitted