

## **DEPARTMENT 55 | COURTROOM INFORMATION**

<b>JUDGE:</b>	Alison Mackenzie
<b>JUDICIAL ASSISTANT:</b>	Steve Temblador
<b>COURTROOM ASSISTANT:</b>	Myra R. Kinney
<b>LOCATION:</b>	111 N. Hill St., Dept. 55 Room 515 (5 <sup>th</sup> Floor) Los Angeles, CA 90012
<b>TELEPHONE NUMBER:</b>	(213) 633-0655
<b>LA COURTCONNECT:</b>	<a href="https://my.lacourt.org/laccwelcome">https://my.lacourt.org/laccwelcome</a>
<b>COURTROOM HOURS:</b>	Monday through Friday (Except for Legal Holidays) 8:30 A.M. – 12:00 P.M. 1:30 P.M. – 4:30 P.M. (Closed for Lunch: 12:00 P.M. – 1:30 P.M.)

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### **CIVILITY**

The Court places a high value on civility, courtesy, and professionalism in the practice of law and the judicial process. The Court expects all attorneys and parties to treat each other, witnesses, jurors, court personnel, the Court, and others with the highest level of courtesy both inside and outside the courtroom.

The Los Angeles County Bar Association has adopted “Guidelines for Civility in Litigation” which the Los Angeles Superior Court has adopted as recommendations to members of the bar. (LASC Local Rules, Appendix 3A, see <https://www.lacourt.org/courtrules/ui/index.aspx?tab=5>.)

The Court expects all attorneys and parties to read and follow those guidelines.

### **CASE MANAGEMENT CONFERENCES**

Case Management Conferences are held at 8:30 a.m. The parties must comply with California Rules of Court, rule 3.722 et seq., and Local Rule 3.25 in connection with such conferences.

Counsel attending a CMC should be sufficiently knowledgeable about the case to address

and agree upon matters listed in the CMC statement, including a discussion about the factual details of the pleadings.

### **SCHEDULING MOTION HEARINGS**

Parties must reserve all motion hearing dates in advance on the Court Reservation System at [www.lacourt.org](http://www.lacourt.org), under “Online Services,” “Civil,” “Court Reservation System (CRS).” Motions are set for hearing at 8:30 a.m., Monday through Friday. The Court issues written tentative rulings for most motions. The Court will post the tentative ruling on the Court’s website.

The Court does not need courtesy copies of filings unless it makes a specific request.

### **EX PARTE APPLICATIONS**

The Court hears ex parte applications at 8:30 a.m., Monday through Friday. The Court typically considers and rules on ex parte applications based on the papers, without hearing oral argument. Attorneys and self-represented parties may appear for ex parte hearings remotely by LACourtConnect. Ex parte applications must comply with the requirements of California Rule of Court, rules 3.1200-3.1207.

Please note that, unless a party is a self-represented litigant or otherwise exempt from mandatory electronic filing requirements, all ex parte applications and supporting papers must be electronically filed by 10:00 A.M. the court day before the ex parte hearing, and any written opposition to an ex parte application must be electronically filed by 8:30 a.m. the day of the ex parte hearing.

### **DISCOVERY DISPUTES**

The Court expects and encourages the parties’ counsel and any self-represented parties to informally resolve discovery disputes, instead of using expensive and cumbersome discovery motions.

The parties must first meet and confer in person, by video conference, or by telephone call to attempt to informally resolve all discovery disputes. If the parties cannot agree, the Court requests that the parties schedule an Informal Discovery Conference (IDC) with the Courtroom Assistant and participate in an IDC before filing any discovery motion. Scheduling an IDC tolls the deadline for filing a discovery motion until further order of the Court.

The Court conducts IDCs at 11:00 a.m., Monday through Friday. Please call the Courtroom Assistant at the number listed above to set up a time for an IDC. The party calling should have already conferred with the other side and be prepared with at least three dates that

work for both sides.

Five days before the IDC, each counsel shall file and serve an IDC statement no longer than three pages, without attachments, or a joint IDC statement no more than five pages, without attachments. The Court prefers joint IDC statements.

The Court does not expect parties to use the IDC process for third-party discovery disputes.

### **TRIAL PREPARATION ORDER**

The Court will set a Final Status Conference at least 10 days before the trial date. Unless the Court orders otherwise, lead trial counsel shall appear at the FSC. Department 55 has a Trial Conference Order that applies to every case set for trial. The Trial Conference Order is attached to the end of this courtroom information sheet. The Court expects the parties' counsel and any self-represented parties to work together to jointly prepare and submit the documents and binders required by that order.

### **LESS EXPERIENCED ATTORNEYS**

The Court strongly encourages law firms and governmental agencies to give less experienced attorneys the opportunity to argue motions, and to have an important role at trial, including examining witnesses, conducting voir dire, and giving opening statements and closing arguments.

### **INTERPRETERS**

Court-certified language interpreters will be provided to limited English-speaking litigants free of charge. Please make the request at the Court's website at <http://www.lacourt.org/irud/UI/ReqInput.aspx> or inform the Judicial Assistant as soon as possible. When presenting your case in court, a court-certified language interpreter must be used.

### **COURT REPORTERS**

The Court does not provide a court reporter absent a fee waiver. A party who has received a fee waiver pursuant to CRC 3.55(7) may request an official court reporter by filing form FW-020 as soon as possible before the hearing or trial. (See CRC 2.956(c).) Given the limited availability of official court reporters, the Court may not know whether a reporter is available until the day of the hearing or trial. Proceedings in unlimited jurisdiction courts are not electronically recorded.

The Court strongly recommends the use of a court reporter for both bench trials and jury trials.

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**  
10 **DEPARTMENT 55**

11  
12 \_\_\_\_\_, ) Case No. \_\_\_\_\_  
13 Plaintiff(s), )  
14 v. ) TRIAL PREPARATION ORDER  
15 \_\_\_\_\_, )  
16 Defendant(s). )  
17 \_\_\_\_\_)

18  
19 The dates for trial and the Final Status Conference having been set in this case, the court  
20 orders as follows:

21 **1. MEET AND CONFER**

22 No later than 18 calendar days before the Final Status Conference, the parties' counsel and  
23 any self-represented parties shall exchange all exhibits they intend to introduce at trial.

24 No later than 11 calendar days before the Final Status Conference, the parties' counsel and  
25 any self-represented parties shall meet and confer to do the following: (1) discuss and prepare the  
26 documents required in Sections 2.B-H, below, and the Motions in Limine Binder, Exhibit Binders,  
27 and Trial Binder required in Sections 3-5, below, (2) discuss and make a good faith effort to stipulate  
28 to the authenticity and admissibility of each trial exhibit, (3) discuss and make a good faith effort to

1 stipulate to resolve each motion in limine, (4) discuss and make a good faith effort to stipulate to  
2 ultimate facts and legal issues, and (5) discuss and make a good faith effort to settle the case.

3 **2. TRIAL DOCUMENTS TO BE FILED**

4 No later than four calendar days before the Final Status Conference, the parties' counsel and  
5 any self-represented parties shall file and serve the following documents:

6 **A. TRIAL BRIEFS (OPTIONAL)**

7 Each party may, but is not required to, file a trial brief succinctly identifying:

- 8 (1) the claims and defenses that remain in dispute for trial;  
9 (2) the major legal issues (with supporting points and authorities);  
10 (3) the relief and calculation of damages sought; and  
11 (4) any other information that may assist the court at trial.

12 **B. JOINT WITNESS LIST**

13 The parties' counsel and any self-represented parties shall work together to prepare and file a  
14 joint list of all witnesses whom any party intends to call at trial, excluding impeachment and rebuttal  
15 witnesses. (Los Angeles County Court Rule ("Local Rule") 3.25, subd. (g)(5).) The joint witness list  
16 shall be organized with columns (in the format set forth below) which state (1) the name of each  
17 witness (in alphabetical order), if the witness is being called to testify as an expert, and any special  
18 requirements or accommodations needed for the witness (*e.g.*, interpreter), (2) the party calling the  
19 witness, (3) whether the witness is actually expected to testify, (4) a brief description of the witness's  
20 expected testimony, (5) an estimate of the length of direct examination (in hours), (6) an estimate of  
21 the length of cross-examination (in hours), and (7) the total estimated length of examination (in  
22 hours). At the end of the joint witness list, the parties and any self-represented parties shall add up  
23 the estimated times for all witnesses' testimony and state the grand total in the last column. Any  
24 witness who is not included on the joint witness list is subject to being excluded from testifying at  
25 trial other than for purposes of giving actual impeachment or rebuttal testimony. Any party who  
26 seeks to elicit testimony from a witness not identified on the witness list must first make a showing of  
27 good cause to the court.

JOINT WITNESS LIST						
Name (State if Expert)	Party Calling (Π/Δ)	Actually Expected To Testify? (Yes/No)	Brief Description of Testimony	Length of Direct (in hours)	Length of Cross (in hours)	Total Length (in hours)

### C. JOINT EXHIBIT LIST

The parties' counsel and any self-represented parties shall work together to prepare and file a joint exhibit list organized with columns (in the format set forth below) which state, as to each exhibit any party intends to offer at trial: (1) the exhibit number, (2) a brief description of the exhibit, (3) which party is offering the exhibit, (4) whether the parties have stipulated to authentication of the exhibit, (5) whether the parties have stipulated to admissibility of the exhibit, (6) any evidentiary objections to admission of the exhibit, (7) the date the exhibit was marked for identification, and (8) the date the exhibit was admitted into evidence. (Local Rule 3.25, subd. (g)(6).) As set forth above, the parties' counsel and any self-represented parties shall meet and confer in an effort to resolve objections to the authenticity and admissibility of each exhibit.

JOINT EXHIBIT LIST							
No.	Description	Offered By (Π/Δ)	Stipulate to Authen.? (Yes/No)	Stipulate to Admiss.? (Yes/No)	Evidentiary Objections	Date marked for ID	Date Admitted

### D. JOINT STATEMENT TO BE READ TO THE JURY

For jury trials, the parties' counsel and any self-represented parties shall work together to prepare and file a brief, joint written statement of the case for the court to read to the jury. (Local Rule 3.25, subd. (g)(4).)

**E. JOINT LIST OF PROPOSED JURY INSTRUCTIONS  
(JOINT AND CONTESTED)**

For jury trials, the parties' counsel and any self-represented parties shall work together to prepare and file a joint list of proposed jury instructions (in the format set forth below) which states, as to each proposed jury instruction: (1) the jury instruction number (listed in numerical order), (2) the title of the jury instruction, (3) the party requesting the jury instruction, (4) whether the jury instruction is agreed upon or contested, (5) a concise statement of any objection, and (6) whether the jury instruction was given by the court ("Joint List of Proposed Jury Instructions").

JOINT LIST OF PROPOSED JURY INSTRUCTIONS					
No.	Title	Requested By (Π/Δ)	Agreed or Contested	Objection	Given (Yes/No)

**F. JURY INSTRUCTIONS  
(JOINT AND CONTESTED)**

For jury trials, the parties' counsel and any self-represented parties shall work together to prepare a complete set of full-text proposed jury instructions, editing all proposed Judicial Council of California Civil Jury Instructions ("CACI") instructions, inserting party names, and eliminating blanks and other irrelevant or inapplicable material. The proposed jury instructions shall be prepared on Los Angeles Superior Court form LASC LACIV 129 or in a Word document that is in the same format. If there is an appropriate CACI jury instruction on a point of law, the court expects the parties to request the CACI instruction instead of a specially prepared jury instruction.

**G. VERDICT FORM(S)**

For jury trials, the parties' counsel and any self-represented parties shall work together to prepare and file a joint proposed general verdict form or a joint proposed special verdict form acceptable to all parties. (Local Rule 3.25, subd. (g)(8).) If the parties cannot agree on a joint verdict



1 form, each party must separately file a proposed verdict form. When a special verdict form is  
2 requested, if there is an appropriate CACI special verdict form for a cause of action, affirmative  
3 defense, or other finding, the court expects the parties to use the CACI special verdict form.  
4

5 **H. JOINT CHART OF PAGE AND LINE DESIGNATIONS FOR**  
6 **DEPOSITION AND FORMER TESTIMONY**

7 If any parties intend to use deposition testimony or former trial testimony in lieu of or in  
8 addition to a witness's live testimony, the parties' counsel and any self-represented parties shall meet  
9 and confer to discuss, and work together to prepare and file, a joint chart in the format set forth below  
10 ("Joint Chart of Page and Line Designations for Deposition and Former Testimony").

11 In the joint chart, each designating party's designations of deposition or former testimony  
12 shall include columns which state: (1) the designation number and name of the witness, (2) the date  
13 and type of testimony (*e.g.*, deposition or trial testimony), (3) the page and line designations of the  
14 deposition or former testimony requested to be used, (4) any objections, (5) whether the other party  
15 has counter-designated any additional deposition or former testimony of the witness that relates to the  
16 designation, and, if so, the designation number of the counter-designation, and (6) the court's ruling.

17 In the joint chart, each counter-designating party's counter-designations of additional  
18 deposition or former testimony of the witness that relates to the designations shall include columns  
19 which state: (1) the designation number and name of the witness, (2) the date and type of testimony  
20 (*e.g.*, deposition or trial testimony), (3) the page and line counter-designations of the deposition or  
21 former testimony requested to be used, (4) any objections, (5) the designation number of the other  
22 party's designation to which the counter-designation relates, and (6) the court's ruling.

23 The parties shall attach copies of the pages of the transcripts of the deposition or former  
24 testimony they are designating or counter-designating to the Joint Chart of Page and Line  
25 Designations for Deposition and Former Testimony, with numbered tabs separating each deposition  
26 or trial transcript. Each designation or counter-designation shall be highlighted, with each party  
27 using a different color highlighter.  
28

**JOINT CHART OF PAGE AND LINE DESIGNATIONS FOR  
DEPOSITION AND FORMER TESTIMONY**

**I. Plaintiff's Designations**

Number/ Witness Name	Date/Type of Transcript	Page:Line Designation	Objections	Is There a Counter? (Yes/No/#)	Ruling
1. John Doe	1/3/20 Depo.	1:2-25	Hearsay	Yes #4	
2. John Doe	3/4/19 Trial Testimony	5:20-25		No	
3. Jane Doe	1/15/20 Depo.	2:5-10		No	

**Defendant's Counter-Designations**

Number/ Witness Name	Date/Type of Transcript	Page:Line Designation	Objections	What # Does This Counter?	Ruling
4. John Doe	1/3/20 Depo.	1:26-2:20		#1	

**II. Defendant's Designations**

Number/ Witness Name	Date/Type of Transcript	Page:Line Designation	Objections	Is There a Counter? (Yes/No/#)	Ruling
5. John Doe	3/4/19 Trial Testimony	5:20-25	No foundation	Yes #7	
6. Jane Doe	1/15/20 Depo.	2:5-10		No	

**Plaintiff's Counter-Designations**

Number/ Witness Name	Date/Type of Transcript	Page:Line Designation	Objections	What # Does This Counter?	Ruling
7. John Doe	3/4/19 Trial Testimony	5:26-6:10		#5	

1 **3. MOTIONS IN LIMINE**

2 Motions in limine shall be noticed for hearing at the Final Status Conference. The parties'  
3 counsel and any self-represented parties shall comply with the statutory notice provisions of Code of  
4 Civil Procedure section 1005 and the requirements of Los Angeles County Court Rule 3.57,  
5 subdivision (a). The caption of each motion in limine shall concisely identify the evidence that the  
6 moving party seeks to exclude. Parties filing more than one motion in limine shall number them  
7 consecutively. Parties filing opposition and reply papers shall identify the corresponding motion  
8 number in the caption of their papers.

9 No later than three calendar days before the Final Status Conference, the parties' counsel and  
10 any self-represented parties shall jointly prepare and lodge in Department 55 a Motions in Limine  
11 Binder. The Motions in Limine Binder shall include one-sided, conformed copies of all motions in  
12 limine, opposition papers, and reply papers, organized in one or more three-ring binders, tabbed in  
13 numerical order with the opposition papers and reply papers for each motion placed directly behind  
14 the moving papers with a colored sheet of paper separating the moving, opposition, and reply papers.

15 **4. EXHIBIT BINDERS**

16 The parties' counsel and any self-represented parties shall work together to jointly prepare  
17 three sets of tabbed, internally paginated by document, and properly-marked exhibits, organized  
18 numerically in three-ring binders (a set for the court, a set for the Judicial Assistant, and a set for the  
19 witnesses) ("Exhibit Binders"). Copies of documentary exhibits shall be one-sided copies. The  
20 parties' counsel and any self-represented parties shall mark all non-documentary exhibits and insert a  
21 simple written description of the exhibit behind the corresponding numerical tab in the Exhibit  
22 Binders. The parties' counsel and any self-represented parties shall also place the court's yellow  
23 evidence tags (with only the case number and exhibit number filled in) on each exhibit in the Judicial  
24 Assistant's copy of the Exhibit Binder. The parties' counsel and any self-represented parties shall  
25 bring one set of the Exhibit Binders to the Final Status Conference for the court to review.

26 **5. TRIAL BINDER**

27 No later than three calendar days before the Final Status Conference, the parties' counsel and  
28 any self-represented parties shall jointly prepare and lodge in Department 55 a Trial Binder,

1 consisting of one-sided, conformed copies, tabbed and organized in a three-ring binder with a table of  
2 contents that includes the following (for trials by the court without a jury, the Trial Binder shall only  
3 include the documents listed under Tabs A, B, C, H, and I):

4 Tab A: Trial Briefs (Optional. If no trial briefs are filed, leave Tab A empty.)

5 Tab B: Joint Witness List

6 Tab C: Joint Exhibit List

7 Tab D: Joint Statement to Be Read to the Jury

8 Tab E: Joint List of Jury Instructions

9 Tab F: Joint and Contested Jury Instructions

10 Tab G: Joint or Contested Verdict Form(s)

11 Tab H: Joint Chart of Page and Line Designations for Deposition and Former  
12 Testimony

13 Tab I: Copies of the Current Operative Pleadings (including the operative complaint,  
14 answer, cross-complaint, if any, and answer to any cross-complaint).

15 The parties shall organize proposed jury instructions into groups behind Tab F in the  
16 following order (labeled by cover sheets): (1) the agreed-upon instructions, (2) plaintiff's requested  
17 instructions to which defendant objects, and (3) defendant's requested instructions to which plaintiff  
18 objects.

19 **6. FAILURE TO COMPLY WITH TRIAL PREPARATION ORDER**

20 The court has discretion to require any party's counsel and any party who fails to comply with  
21 this Trial Preparation Order to show cause why the court should not impose monetary, evidentiary,  
22 and/or issue sanctions.

23 IT IS SO ORDERED.

24  
25 Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Alison Mackenzie  
Superior Court Judge

26  
27  
28 11/13/2023