

COURTROOM INFORMATION

DEPARTMENT 74

[Rev. 07/01/24]

JUDGE:	Colin Leis
JUDICIAL ASSISTANT:	L. Meguerian
COURTROOM ASSISTANT:	--
TELEPHONE NUMBER:	(213) 830-0774
LOCATION	Department 74 7th Floor, Room 735 Stanley Mosk Courthouse 111 N. Hill St. Los Angeles, CA 90012

Welcome to Department 74. The court appreciates attorneys and self-represented parties taking the time to read and comply with the policies and procedures set forth below.

1. Motions

All motion hearing dates must be reserved in advance on the Court Reservation System at www.lacourt.org, under “Online Services,” “Civil,” “Court Reservation System (CRS).” Motions are set for hearing Monday through Friday.

Under the rules of court and the court’s general orders, all filings must be electronically filed unless the filer is a self-represented litigant or otherwise exempted from mandatory electronic filing.

Except for trial documents, motions in limine, and trial exhibits, Department 74 aims to be a paperless department. Thus, unless the court orders otherwise, the court does not need courtesy copies.

2. Motions to Seal

Department 74 strictly enforces California Rules of Court, rules 2.550 and 2.551. Accordingly, stipulated protective orders that suffice for discovery are inadequate for non-discovery motions. In conjunction with setting a hearing on a motion to seal, the moving party must file, serve, and email to Department 74's email service account (smcdept77@lacourt.org) a proposed sealing order that is MS-Word editable at least 15 days before the hearing on the motion to seal. The moving party must also lodge with Department 74 no later than three days after filing the motion to seal the documents subject to the proposed sealing order in which the proposed redactions are red-lined.

The proposed sealing order must state proposed non-conclusory, express facts supporting sealing. (CRC 2.550(d), (e)(1)(A).) "Non-conclusory" means findings more specific than merely repeating the wording of CRC 2.550, subdivisions (d)(1-5). Without repeating the language of each proposed redaction, the proposed sealing order must separately identify by document name, page, and line number each and every proposed redaction. For each proposed redaction, the proposed sealing order must, akin to a ruling sheet, contain immediately to the right a space for the court to mark "Granted" or "Denied" for each proposed redaction. After the court rules on the motion to seal, the parties may use the ruling sheet to make the redactions in the documents that they will thereafter file in the court's public record.

3. Ex Parte Applications

Ex parte applications are set for 8:30 a.m., Monday through Friday. The court typically considers and rules on ex parte applications in chambers based on the papers, without hearing oral argument. Attorneys and self-represented parties may appear for ex parte hearings by telephone or videoconference.

Ex parte applications must comply with the requirements of California Rules of Court, rules 3.1200-3.1207.

Please note that section 8 of the First Amended General Order governing Mandatory Electronic Filing for Civil, filed May 3, 2019, provides that, with the exception of self-represented litigants and other persons excused from filing documents electronically:

- a) Ex parte applications and all documents in support thereof must be electronically filed no later than 10:00 a.m. the day before the ex parte hearing.
- b) Any written opposition to an ex parte application must be electronically filed by 8:30 a.m. the day of the ex parte hearing.

4. Court Reporters

Because Department 74 is dedicated to unlimited jurisdiction civil cases, the services of an official court reporter are not available for hearings or trials in Department 74, except as provided by California Rules of Court, rule 2.956, subdivision (c), and Los Angeles Superior Court Local Rules, Rule 2.21, subdivision (a). A party who has not received a fee waiver may arrange for the presence of a certified shorthand reporter to serve as official pro tempore reporter pursuant to California Rules of Court, rule 2.956, subdivision (c), and Los Angeles Superior Court Local Rules, Rule 2.21, subdivisions (a) and (e). A party who has received a fee waiver may request an official court reporter pursuant to California Rules of Court, rule 2.956, subdivision (c), and Los Angeles Superior Court Local Rules, Rule 2.21, subdivision (a).

The court strongly recommends the use of court reporters for both court and jury trials.

5. Discovery Disputes and Informal Discovery Conferences

The court encourages the parties' counsel and any self-represented parties to try to informally resolve their discovery disputes. The court expects the parties' counsel and any self-represented parties first to meet and confer to make a reasonable and good faith attempt to informally resolve each discovery issue in dispute. If the parties do not resolve their dispute by meeting and conferring but the parties mutually agree that an informal discovery conference might help, either party may request before filing a discovery motion that the court conduct an informal discovery conference to discuss the dispute. (Code Civ. Proc., § 2016.080.) The court expects the responding party to grant the moving party a reasonable extension of time to file a motion concerning the discovery in dispute in order to enable the parties to schedule and conduct an informal discovery conference.

To request an informal discovery conference, you must use Los Angeles Superior Court form LACIV 094, and reserve a hearing date on the Court Reservation System. On LACIV 094 briefly describe the nature of the discovery dispute in font no smaller than 12-point, one or one-and-a-half spaced in the area provided on the form. No attachments are allowed. Because an informal discovery conference is not a fully-briefed hearing, the court normally does not make any orders at the informal discovery conference unless the parties stipulate.

6. Trial Preparation Order

Department 74 has a Trial Preparation Order which applies to every case set for trial. 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.

Please pay particular attention to your mutual obligation to deliver to Department 74 your joint motion-in-limine binders and joint trial binders at least five court days before the final status conference. Opposing counsel's or party's failure to comply with the obligation to jointly

prepare such binders does not relieve any other counsel or party from the obligation to prepare and timely deliver its own (albeit unilateral) binders.

Exhibit binders are not needed until the first day of trial.

7. Electronically Lodged Documents Which Require Action by the Court

The court requests that, after the parties' counsel or any self-represented parties electronically lodge a document which requires action by the court (*e.g.*, stipulation and proposed order, and proposed judgment), they please refrain from calling the court's staff to ask about the status of the document, and that they instead follow the document's progress on the court's Website (which the court updates as soon and as often as possible).

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**
10 **DEPARTMENT 74**

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12 _____,) Case No. _____
13 Plaintiff(s),)
14 v.) **BENCH TRIAL PREPARATION ORDER**
15 _____,) [Rev. 07/01/24]
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-D, 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 five court days before the Final Status Conference, the parties' counsel and any
5 self-represented parties shall file and serve the following documents:

6 **A. TRIAL BRIEFS**

7 Each party shall 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 (*e.g.* approximately 8-12
20 words), non-conclusory description of the witness's expected testimony (*e.g.* "percipient" is too
21 conclusory; instead, describe what the witness perceived); (5) an estimate of the length of direct
22 examination (in hours); (6) an estimate of the length of cross-examination (in hours); and, (7) the
23 total estimated length of examination (in hours). At the end of the joint witness list, the parties and
24 any self-represented parties shall add up the estimated times for all witnesses' testimony and state the
25 grand total in the last column. Any witness who is not included on the joint witness list is subject to
26 being excluded from testifying at trial other than for purposes of giving actual impeachment or
27 rebuttal testimony. Any party who seeks to elicit testimony from a witness not identified on the
28 witness list must first make a showing of 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 for 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 to try 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 CHART OF PAGE AND LINE DESIGNATIONS FOR DEPOSITION AND FORMER TESTIMONY

If any parties intend to use deposition testimony or former trial testimony in lieu of or in addition to a witness's live testimony, the parties' counsel and any self-represented parties shall meet

1 and confer to discuss, and work together to prepare and file, a joint chart in the format set forth below
2 (“Joint Chart of Page and Line Designations for Deposition and Former Testimony”).

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

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

15 The parties shall submit copies of the pages of the transcripts of the deposition or former
16 testimony they are designating or counter-designating with numbered tabs separating each deposition
17 or trial transcript. Each designation or counter-designation shall be highlighted, with each party using
18 a different color highlighter.

**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 are more appropriate for jury trials than non-jury trials. In many non-jury
3 trials, motions in limine are unnecessary. But if the parties anticipate disputes about important
4 evidentiary issues, it may help the court for the parties to file briefs about those issues in advance.
5 Before a party files a motion in limine, the court expects counsel and self-represented parties to have
6 acquainted themselves with the legal principles governing the appropriate and inappropriate use of
7 motions in limine as described, for example, in *Kelley v. New West Federal Savings* (1996) 49
8 Cal.App.4th 659, 670-671 and Los Angeles County Court Rule 3.57. Even if the court does not grant
9 a party's motion in limine before testimony begins, bringing the issue to the court's attention in a
10 timely manner may help expedite the trial.

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

18 No later than five court days before the Final Status Conference, the parties' counsel and any
19 self-represented parties shall jointly prepare and lodge in Department 3 a Motions in Limine Binder.
20 The Motions in Limine Binder shall include one-sided, conformed copies of all motions in limine,
21 opposition papers, and reply papers, organized in one or more three-ring binders, tabbed in numerical
22 order with the opposition papers and reply papers for each motion placed directly behind the moving
23 papers with a colored sheet of paper separating the moving, opposition, and reply papers.

24 **4. EXHIBIT BINDERS**

25 The parties' counsel and any self-represented parties shall work together to jointly prepare
26 four sets of tabbed, internally paginated by document, and properly-marked exhibits, organized
27 numerically in three-ring binders (a set for the court, a set for the Judicial Assistant, and a set for the
28 witnesses) ("Exhibit Binders"). Copies of documentary exhibits shall be one-sided copies. The

1 parties' counsel and any self-represented parties shall mark all non-documentary exhibits and insert a
2 simple written description of the exhibit behind the corresponding numerical tab in the Exhibit
3 Binders.

4 **5. TRIAL BINDER**

5 No later than five court days before the Final Status Conference, the parties' counsel and any
6 self-represented parties shall jointly prepare and lodge in Department 74 a Trial Binder, consisting of
7 one-sided, conformed copies, tabbed and organized in a three-ring binder with a table of contents that
8 includes the following:

9 Tab A: Trial Briefs

10 Tab B: Joint Witness List

11 Tab C: Joint Exhibit List

12 Tab D: Joint Chart of Page and Line Designations for Deposition and Former
13 Testimony

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

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

17 The court has discretion to require any party's counsel and any party who fails to comply with
18 this Trial Preparation Order to show cause why the court should not impose monetary, evidentiary,
19 and/or issue sanctions. (Code Civ. Proc., § 177.5.)

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21 IT IS SO ORDERED.

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24 Dated: _____

Colin Leis
JUDGE OF THE SUPERIOR COURT

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**
10 **DEPARTMENT 74**

11
12 _____,) Case No. _____
13 Plaintiff(s),)
14 v.) **JURY TRIAL PREPARATION ORDER**
15 _____,) [Rev. 07/01/24]
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 five court days before the Final Status Conference, the parties' counsel and any
5 self-represented parties shall file and serve the following documents:

6 **A. TRIAL BRIEFS**

7 Each party shall 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 (*e.g.* approximately 8-12
20 words), non-conclusory description of the witness's expected testimony (*e.g.* "percipient" is too
21 conclusory; instead, describe what the witness perceived); (5) an estimate of the length of direct
22 examination (in hours); (6) an estimate of the length of cross-examination (in hours); and, (7) the
23 total estimated length of examination (in hours). At the end of the joint witness list, the parties and
24 any self-represented parties shall add up the estimated times for all witnesses' testimony and state the
25 grand total in the last column. Any witness who is not included on the joint witness list is subject to
26 being excluded from testifying at trial other than for purposes of giving actual impeachment or
27 rebuttal testimony. Any party who seeks to elicit testimony from a witness not identified on the
28 witness list must first make a showing of 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 for 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 to try 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 for 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.

The parties' trial binder(s) shall include a thumb drive containing electronically editable copies of proposed jury instructions.

1 **G. VERDICT FORM(S)**

2 For jury trials, the parties' counsel and any self-represented parties shall work together to
3 prepare and file a joint proposed general verdict form or a joint proposed special verdict form
4 acceptable to all parties. (Local Rule 3.25, subd. (g)(8).) If the parties cannot agree on a joint verdict
5 form, each party must separately file a proposed verdict form. When a special verdict form is
6 requested, if there is an appropriate CACI special verdict form for a cause of action, affirmative
7 defense, or other finding, the court expects the parties to use the CACI special verdict form.

8 The parties' trial binder(s) shall include a thumb drive containing electronically editable
9 copies of proposed verdict forms (which can be on the same thumb drive as the one containing jury
10 instructions.)

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12 **H. JOINT CHART OF PAGE AND LINE DESIGNATIONS FOR**
13 **DEPOSITION AND FORMER TESTIMONY**

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

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

24 In the joint chart, each counter-designating party's counter-designations of additional
25 deposition or former testimony of the witness that relates to the designations shall include columns
26 which state: (1) the designation number and name of the witness; (2) the date and type of testimony
27 (*e.g.*, deposition or trial testimony); (3) the page and line counter-designations of the deposition or
28

former testimony requested to be used; (4) any objections; (5) the designation number of the other party's designation to which the counter-designation relates; and, (6) the court's ruling.

The parties shall submit copies of the pages of the transcripts of the deposition or former testimony they are designating or counter-designating with numbered tabs separating each deposition or trial transcript. Each designation or counter-designation shall be highlighted, with each party using a different color highlighter.

**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	

3. MOTIONS IN LIMINE

Motions in limine shall be noticed for hearing at the Final Status Conference. Before a party files a motion in limine, the court expects counsel and self-represented parties to have acquainted themselves with the legal principles governing the appropriate and inappropriate use of motions in limine as described, for example, in *Kelley v. New West Federal Savings* (1996) 49 Cal.App.4th 659, 670-671 and Los Angeles County Court Rule 3.57.

The parties' counsel and any self-represented parties shall comply with the statutory notice provisions of Code of Civil Procedure section 1005 and file declarations that comply with the requirements of Los Angeles County Court Rule 3.57, subdivision (a). The caption of each motion in limine shall concisely identify the evidence that the moving party seeks to exclude. Parties filing more than one motion in limine shall number them consecutively. Parties filing opposition and reply papers shall identify the corresponding motion number in the caption of their papers.

No later than five court days before the Final Status Conference, the parties' counsel and any self-represented parties shall jointly prepare and lodge in Department 74 a Motions in Limine Binder. The Motions in Limine Binder shall include one-sided, conformed copies of all motions in limine, opposition papers, and reply papers, organized in one or more three-ring binders, tabbed in numerical order with the opposition papers and reply papers for each motion placed directly behind the moving papers with a colored sheet of paper separating the moving, opposition, and reply papers.

4. EXHIBIT BINDERS

The parties' counsel and any self-represented parties shall work together to jointly prepare four sets of tabbed, internally paginated by document, and properly-marked exhibits, organized numerically in three-ring binders (a set for the court, a set for the Judicial Assistant, and a set for the witnesses) ("Exhibit Binders"). Copies of documentary exhibits shall be one-sided copies. The parties' counsel and any self-represented parties shall mark all non-documentary exhibits and insert a

1 simple written description of the exhibit behind the corresponding numerical tab in the Exhibit
2 Binders.

3
4 **5. TRIAL BINDER**

5 No later than five court days before the Final Status Conference, the parties' counsel and any
6 self-represented parties shall jointly prepare and lodge in Department 74 a Trial Binder, consisting of
7 one-sided, conformed copies, tabbed and organized in a three-ring binder with a table of contents that
8 includes the following (for bench trials without a jury, the Trial Binder shall only include the
9 documents listed under Tabs A, B, C, H, and I):

10 Tab A: Trial Briefs

11 Tab B: Joint Witness List

12 Tab C: Joint Exhibit List

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

14 Tab E: Joint List of Jury Instructions

15 Tab F: Joint and Contested Jury Instructions

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

17 Tab H: Joint Chart of Page and Line Designations for Deposition and Former
18 Testimony

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

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

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

26 The court has discretion to require any party's counsel and any party who fails to comply with
27 this Trial Preparation Order to show cause why the court should not impose monetary, evidentiary,
28 and/or issue sanctions. (Code Civ. Proc., § 177.5.)

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IT IS SO ORDERED.

Dated: _____

Colin Leis
JUDGE OF THE SUPERIOR COURT