

**HONORABLE TODD W. ROBINSON
UNITED STATES DISTRICT JUDGE
STANDING ORDER FOR CIVIL CASES**

For questions regarding filing and/or docketing, contact:

- the Clerk's Office at (619) 557-5600,
- the CM/ECF Helpline at (866) 233-7983, and/or
- the CASD CM/ECF Helpdesk at ecfhelp@casd.uscourts.gov.

For criminal matters, contact Jessica Ortiz (Courtroom Deputy) at Jessica_A_Ortiz@casd.uscourts.gov.

For civil matters, contact Judge Robinson's law clerks in chambers at (619) 321-0975.

For transcript requests, contact Cami Kircher (Court Reporter) at cpkirchercsr@gmail.com.

Unless otherwise ordered by the Court, counsel and *pro se* litigants are expected to follow the Federal Rules of Civil Procedure, the Civil Local Rules for the Southern District of California (the "Civil Local Rules"), the Electronic Case Filing Administrative Policies and Procedures Manual (the "ECF Manual"), and any other applicable rules. The Civil Local Rules and the ECF Manual are available on this District's website at <https://www.casd.uscourts.gov/rules/local-rules.aspx>. Those who are proceeding without counsel are also encouraged to take advantage of this District's website for *pro se* litigants, available at <https://www.casd.uscourts.gov/ProSe.aspx>, and the resources available in the Clerk's Office. *Failure to comply with the applicable Orders and rules, including the ECF Manual, may result in the Court striking non-compliant documents from the record pursuant to ECF Manual Section 2(a) and/or imposing sanctions pursuant to Civil Local Rule 83.1.*

I. Communications with Chambers

Telephone calls to chambers are permitted only for scheduling or calendaring motion hearings or as otherwise authorized by the Court. Court personnel are prohibited from interpreting Orders, discussing the merits of a case, giving legal advice (including advice on procedural matters), assisting with filings, or speculating as to when an Order will be issued. Letters, faxes, and emails are prohibited unless otherwise authorized by the Court.

Any questions or concerns regarding electronic filing should be directed to the Clerk's Office, the CM/ECF Helpline, or the CASD CM/ECF Helpdesk after first consulting the Local Rules and ECF Manual.

II. Discovery

Counsel must contact the Magistrate Judge's chambers directly for all matters pertaining to discovery. Any objection to a discovery ruling of the Magistrate Judge must be filed as a motion pursuant to Civil Local Rule 7.1.

III. Motion Practice

A. *Generally Applicable Rules*

1. *Conference of Counsel and/or Pro Se Litigants*

Unless otherwise excused by the Court, before filing any motion except a motion in a case involving an incarcerated *pro se* party, the parties must meet and confer in good faith, preferably in person and not by email, to attempt to resolve the issue without involving the Court. The movant(s) must include a statement of compliance with this provision in their notice of motion. *Failure to include a statement of compliance may result in the striking or summary denial of the motion.*

2. *Failure Timely to Oppose*

An opposing party's failure timely to file an opposition to any motion may be construed as consent to the granting of the motion pursuant to Civil Local Rule 7.1(f)(3)(c). *Take note that the Court's default briefing schedule differs from that appearing in the District's Civil Local Rules. See infra* Section III.B.2.

3. *Exhibits*

Copies of documents already contained on the electronic docket must not be filed as exhibits. The parties must also avoid duplication of exhibits as much as possible. If the same exhibit is referred to in more than one motion noticed for the same day, the exhibit should be filed only once. Similarly, if more than one party refers to the same exhibit relative to a motion noticed for the same day, only one party should file the exhibit. The parties must use precise citations to assist the Court in locating all exhibits.

All exhibits submitted in support of motions should be excerpted to include only relevant material. All exhibits must also be clearly labeled, dated, tabbed, and indexed.

4. *Courtesy Copies*

Parties must provide the Court with courtesy copies of any filings exceeding twenty (20) pages in length, including all attachments and exhibits, as soon as practicable after filing. Courtesy copies may be delivered by mail, express package delivery service, courier, or hand to chambers at 333 W. Broadway, Suite 1410, San Diego, CA 92101, or the Clerk's Office at 333 W. Broadway, Suite 420, San Diego, CA 92101. The Court prefers courtesy copies of memoranda to be printed single-sided. If a filing has more than three (3) exhibits, the exhibits must be tabbed and listed in a table of exhibits.

5. *Amended Pleadings*

Any amended pleading—not just those accompanying a motion for leave to amend—must be accompanied by a redline showing how the amended pleading differs from the operative pleading.

6. *Unreported Cases*

For unreported cases, the Court prefers Westlaw citations, if available. In the event a case is not available through Westlaw or Lexis, a copy must be provided.

7. *Pro Hac Vice Applications*

Judge Robinson will accept counsel in Los Angeles County or south thereof as “local” for purposes of *pro hac vice* applications. *Please note that the applicant must sign in two places on the first page of the application.*

B. *Rules for Noticed Motions*

1. *Hearing Dates and Oral Argument*

Civil motions will generally be scheduled for Thursday afternoons, beginning at 1:30 p.m. The Court typically hears oral argument on all civil motions. If the Court determines that a matter may be resolved on the papers without oral argument in accordance with Civil Local Rule 7.1(d)(1), the Court will issue an Order vacating the hearing.

Pursuant to Civil Local Rule 7.1(b), all dates for motion hearings must be obtained by calling chambers before filing any motion. Motion papers must be filed and served within three (3) calendar days of obtaining a motion hearing date from chambers. *Failure to comply with this requirement may result in the forfeiture of the assigned hearing date.*

In the event the moving party desires to submit on the papers, the phrase “No Oral Argument Requested” should appear on the caption. Even if no oral argument is requested, the moving party must still obtain a hearing date from chambers, which will remain on calendar unless and until the Court vacates it by separate Order. If the moving party indicates that no oral argument is requested, the non-moving party may request that the Court hold oral argument in its opposition.

2. *Briefing Schedule*

Because it is the Court’s preference to hold hearings on nearly all civil motions, the Court modifies the briefing schedule set by Civil Local Rule 7.1(e) as follows to provide both the parties and the Court sufficient time to brief and prepare for oral argument: Any opposition (or statement of non-opposition) must be filed and served no later than twenty-eight (28) calendar days prior to the noticed hearing date, and any reply must be filed and served no later than fourteen (14) calendar days prior to the noticed hearing date, with both deadlines calculated pursuant to Federal Rule of Civil Procedure 6(a)(1).

3. *Briefing*

When the same party (or more than one party represented by the same counsel) notices multiple motions for the same hearing date, the motions must be briefed together in a single memorandum of points and authorities not to exceed twenty-five (25) pages in length.

If multiple parties are moving for substantially the same relief, they must make every effort to obtain the same hearing date for their motions. If multiple parties are moving for substantially the same relief or opposing a motion seeking substantially the same relief sought against them and noticed for the same hearing date, counsel must make every effort to coordinate and consolidate the briefing or use the notice-of-joinder procedure to avoid duplication in briefing.

Factual matters or legal arguments raised by a party for the first time in their reply brief, unless directly in response to the opposition, may not be considered.

4. *Objections*

Objections to evidence submitted in support of a motion must be contained within the opposition brief, and objections to evidence submitted in support of an opposition must be contained within the reply brief. No separate statements of objections will be allowed or considered.

5. *Surreplies and Notices of Supplemental Authority*

Surreplies and notices of supplemental authority may not be filed without leave of Court, unless there is a subsequent change in binding law that is directly on point. Under these circumstances, the party may file a notice of supplemental authority that includes a copy of the order or opinion and any case-identifying information. Counsel may not include any argument in the notice; the Court will request supplemental briefing if necessary.

6. *Motions and Cross-Motions for Summary Judgment*

Absent leave of the Court, all motions for summary judgment and summary-judgment-related *Daubert* motions will be set for a single hearing date in the interests of judicial economy and efficiency. Accordingly, pursuant to Civil Local Rule 7.1(h), no party (or more than one party represented by the same counsel) may file a memorandum exceeding twenty-five (25) pages without requesting from the Court an extension of the default page limits at least three (3) court days before the memorandum is to be filed.

If opposing parties intend to move for summary judgment, cross-motions and a consolidated briefing schedule are appropriate. As discussed through the meet-and-confer process, *see supra* Section III.A.1, one party (or more than one party represented by the same counsel) shall file its motion for summary judgment together with any summary-judgment-related *Daubert* motions by the deadline for pre-trial motions set by the Magistrate Judge in the operative scheduling order. Within three (3) calendar days of being served with the summary judgment motion, the opposing party (or more than one party represented by the same counsel) shall file an

ex parte application requesting a consolidated briefing schedule or, alternatively, the parties shall file a joint motion for the same. Once the application or joint motion is granted, the Court will issue a briefing schedule setting the deadline for the opposing party's consolidated cross-motion and opposition, as well as all other relevant filings

Separate Statements of Fact *may not* be filed unless leave of Court has been granted. Rather, the parties must meet and confer to arrive at a joint statement of undisputed material facts, which must be filed no later than the reply brief. All facts listed in a statement of material facts must be supported by pin citations to evidence in the record. All material facts referenced in a summary-judgment memorandum must cite either to the joint statement of undisputed facts or to specific pages in the evidentiary record.

Failure to comply with these requirements may result in the striking or summary denial without prejudice of the nonconforming motion.

7. *List of Terms/Names*

For technical motions, the parties must send an email to chambers one (1) week prior to the hearing with a list of pertinent technical terms and/or proper names to assist the court reporter.

8. *Telephonic Appearances*

Although the Court recognizes that telephonic appearances may be necessary, the Court strongly prefers that noticed hearings be held in-person in open court. Any party requesting to appear telephonically must obtain leave of the Court by filing an *ex parte* motion at least three (3) court days before the scheduled hearing. Any individual requesting to observe telephonically must contact chambers at least one (1) calendar day before the scheduled hearing to obtain the public dial-in information. The Court is generally unable to accommodate video appearances.

C. *Rules for Joint and Ex Parte Motions*

1. *Temporary Restraining Orders*

All motions for temporary restraining orders must be briefed; a request for immediate injunctive relief contained in a pleading is not sufficient. While temporary restraining orders may be heard in true *ex parte* fashion, *i.e.*, without notice to an opposing party, the Court will do so only in extraordinary circumstances. The Court's strong preference is for the opposing party to be served and afforded a reasonable opportunity to file an opposition. In appropriate cases, the Court may issue a limited restraining order to preserve evidence pending further briefing.

2. *Joint Motions*

Pursuant to Section 2(f)(4) of the ECF Manual, all stipulations must be filed as joint motions.

3. Ex Parte Applications

All *ex parte* applications must comply with Civil Local Rule 83.3(g) and satisfy the applicable legal standard, with a particular focus on the diligence of the movant and any prejudice that may result in the absence of the requested *ex parte* relief. The Court may rule on *ex parte* applications without requiring a response from the opposing party. If a party intends to oppose an *ex parte* application, that party must file a notice as soon as practicable and within twenty-four (24) hours of the filing of the *ex parte* application stating their intent to oppose the *ex parte* application and the date on which the opposition will be filed.

4. Motions for Leave to File Documents Under Seal

Given the strong presumption in favor of access to court records, parties seeking a sealing order must exercise discretion, limiting their requests to only those documents or portions of documents for which compelling reasons (for dispositive, *i.e.*, those more than tangentially related to the merits of the case, motions) or good cause (for non-dispositive, *i.e.*, only tangentially related to the merits of the case, motions) exist to file the document under seal. *See Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178–80 (9th Cir. 2006). *The existence of a stipulated protected order, standing alone, is insufficient to justify sealing under either standard.* Any party filing a motion for leave to file documents under seal must provide the Court with (1) a specific description of each document or portion of a document they seek to protect, and (2) a declaration showing sufficiently compelling reasons or good cause to protect those documents from disclosure. The proposed redactions must be evident (either highlighted or bracketed) from the sealed lodgment. The standard for filing documents under seal will be strictly applied, and all proposed redactions must be as narrowly tailored as possible.

If the moving party seeks to file a document under seal based on another party’s designation of the document as “confidential” under a protective order, the moving party must first meet and confer with the designating party to determine whether the designating party maintains that any portion of the document must be filed under seal. Because the ultimate burden of proof remains on the designating party, they may file a supplemental brief and/or evidence supporting their arguments that sealing is required under the applicable standard.

D. Use of Generative Artificial Intelligence

Although the use of ChatGPT and other such generative artificial intelligence (“AI”) tools is not prohibited, unqualified reliance on such tools may result in filings “replete with misrepresentations and fabricated case law.” *See Grant v. City of Long Beach*, 96 F.4th 1255, 1256 (9th Cir. 2024) (striking opening brief and dismissing appeal). “Rule 11 imposes a duty on attorneys [and *pro se* litigants] to certify that they have conducted a reasonable inquiry and have determined that any papers filed with the court are well grounded in fact[and] legally tenable.” *See Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 393 (1990). Accordingly, failure to exercise due care in reviewing and filing work product created with the assistance of generative AI tools may violate Rule 11 and other applicable standards of practice and expose the filer to sanctions or other corrective or disciplinary action. *See, e.g., Park v. Kim*, 91 F.4th 610, 614 (2d Cir. 2024) (referring attorney who filed brief relying on non-existent cases to grievance panel).

IV. Continuances and Extensions

Parties requesting a continuance of a court date or an extension of a deadline must meet and confer with all other parties who have made an appearance prior to contacting the Court. If all appearing parties reach an agreement, they should file a joint motion. If no other parties have appeared or the appearing parties fail to reach an agreement, the party requesting the continuance or extension must file an *ex parte* application complying with all applicable rules and satisfying the relevant legal standard. Absent extraordinary circumstances, any request for a continuance or extension must be filed no later than three (3) court days before the relevant date.

V. Settlement

If a case settles, the parties must notify the Court and the assigned Magistrate Judge as soon as practicable by filing a Notice of Settlement. If the Magistrate Judge does not set a deadline for the filing of a Joint Motion to Dismiss, the parties must file a Joint Motion to Dismiss within twenty-eight (28) calendar days of the settlement.

Any joint motion for dismissal or notice of dismissal that includes a provision that the Court retain jurisdiction will be rejected unless it is accompanied by a Consent to Jurisdiction by a United States Magistrate Judge form (“Consent Form”) over all disputes arising out of the settlement agreement, including interpretation and enforcement of the settlement agreement, signed by all parties and their counsel. A template Consent Form can be found on the Court’s website at <https://www.casd.uscourts.gov/Judges/robinson/docs/Consent%20to%20Magistrate%20Judge%20Jurisdiction%20Form.docx>. Pursuant to Section 2(h) of the ECF Manual, the fully executed Consent Form must NOT be filed on the docket with the joint motion for dismissal or notice of dismissal, but rather should be emailed to efile_robinson@casd.uscourts.gov (the “E-file Email”).

VI. Final Pretrial Conference and Motions *in Limine*

The Final Pretrial Conference (“PTC”) will be held on the date set by the Magistrate Judge in the operative scheduling order. Before that date, as applicable and unless ordered otherwise by the Court or the Magistrate Judge, the Court will require the Parties to submit the following materials, the requirements of which are discussed in further detail in Section VII below:

Event(s)	Deadline
File all motions <i>in limine</i> , including all trial-related <i>Daubert</i> motions, in a single, omnibus brief not to exceed <u>twenty-five (25) pages</u> .	Five (5) weeks before PTC
File memoranda of contentions of fact and law in accordance with Civil Local Rule 16.1(f)(2).	Four (4) weeks before PTC

<ol style="list-style-type: none"> 1. Meet and confer in accordance with Civil Local Rule 16.1(f)(4); and 2. File all oppositions to motions <i>in limine</i>, including all trial-related <i>Daubert</i> motions, in a single, omnibus brief not to exceed <u>twenty-five (25) pages</u>. 	<p style="text-align: center;">Three (3) weeks before PTC</p>
<ol style="list-style-type: none"> 1. File and lodge in Word format with the E-file Email proposed jury instructions; 2. File and lodge in Word format with the E-file Email proposed verdict forms; 3. File and lodge in Word format with the E-file Email proposed jury questionnaires; 4. File a list of any witnesses who will appear by deposition and attach and designate or mark all portions of the deposition testimony which will be offered at trial; 5. File brief and concise joint statement of the case to be read to the jury; and 6. File all stipulations and agreements. 	<p style="text-align: center;">Two (2) weeks before PTC</p>
<ol style="list-style-type: none"> 1. Lodge in Word format with the E-file Email a proposed pretrial order in accordance with the requirements of Civil Local Rule 16.1(f)(6); and 2. File objections to proposed jury instructions, verdict forms, jury questionnaires, and deposition designations and/or counter-designations. 	<p style="text-align: center;">Seven (7) days before PTC</p>

At the PTC, trial counsel must be prepared to discuss (1) scheduling; (2) reasonable time limits; (3) issues relating to proof, including stipulations and motions *in limine*; (4) jury selection (if applicable); (5) jury instructions (if applicable); (6) the verdict form (if applicable); (7) settlement or alternative-dispute resolution avenues; and (8) any and all other issues related to trial. The Court will set a trial date and reasonable time limits for the trial in consultation with counsel at the PTC.

VII. Trial Procedures

A. Bench Trial-Specific Procedures

The Court will permit opening statements. Rather than hear closing arguments, unless otherwise ordered, the parties will be permitted to file closing briefs not to exceed twenty-five (25) pages within four (4) weeks of the date on which all relevant transcripts become available.

B. Jury Trial-Specific Procedures

1. Motions in Limine

So that the parties and the Court may focus on those evidentiary issues that are most consequential and genuinely disputed, absent extraordinary circumstances and without leave of the Court, the Court will entertain no more than five (5) motions in limine—including trial-related *Daubert* motions—per side. All motions *in limine* must be filed in a single, omnibus brief not to exceed twenty-five (25) pages.

2. Jury Instructions

Unless otherwise ordered by the Court, the parties shall serve their proposed preliminary and final jury instructions on each other with sufficient time to meet, confer, and jointly file a complete set of agreed-upon instructions no later than two (2) weeks before the PTC. If the Parties cannot agree upon one complete set of instructions, they shall file both (1) a joint set of the agreed-upon preliminary and final instructions, and (2) separate supplemental sets of instructions that are not agreed upon no later than two (2) weeks before the PTC.

The agreed-upon instructions and any supplemental instructions not agreed upon shall state the number of the proposed instruction, the instruction itself, and any authority supporting the instruction. The Court prefers to use the Ninth Circuit Civil Jury Instructions for issues of federal law and the Judicial Council of California Civil Jury Instructions (“CACI”) for issues of California state law whenever possible. If any instructions are pattern instructions, the instruction shall cite the source of the instruction. The parties shall clearly indicate any modifications of instructions from statutory authority, Ninth Circuit pattern instructions, or CACI pattern instructions and shall include any authority supporting the modification.

If the parties file supplemental sets of instructions not agreed upon, any objections shall be due no later than one (1) week before the PTC. Any objection shall contain a concise statement of argument concerning the objection, including citations to authority.

In addition to filing the proposed preliminary and final jury instructions on the docket, the parties shall email the agreed-upon instructions and any supplemental instructions not agreed upon in Word format to the E-file Email.

Following the PTC, the Court will provide each party with the jury instructions the Court intends to use. It is each party’s responsibility carefully to review the instructions and make suggestions to the Court if modifications appear necessary.

3. Proposed Jury Questionnaire and Verdict Forms

Unless otherwise ordered by the Court, following meet-and-confer efforts, counsel shall serve, file, and lodge in Word format to the E-file Email a joint proposed jury questionnaire for use during *voir dire* and a joint proposed verdict form no later than two (2) weeks before the PTC.

If the parties cannot agree on a joint proposed jury questionnaire and/or verdict form, each party shall file a separate proposed jury questionnaire and/or verdict form no later than two (2) weeks before the PTC. Any written objections to the other party's proposed jury questionnaire and/or verdict form must be filed no later than one (1) week before the PTC. In addition to filing the proposed jury questionnaire(s) and verdict form(s) on the docket, the parties shall email the proposed jury questionnaire(s) and verdict form(s) in Word format to the E-file Email.

4. *Stipulations*

Stipulations and agreements must be reduced to writing and marked as an exhibit. All facts that are not contested must be listed in a form suitable to be read to the jury.

5. *Jury Selection*

Jessica Ortiz, the Courtroom Deputy, will provide counsel with a numerical list of the jury panel ("strike sheet") at the start of *voir dire*. The Court will conduct the initial jury *voir dire*. On a case-by-case basis, the Court may permit follow-up *voir dire* to be conducted by the attorneys. If *voir dire* by counsel is permitted, fifteen (15) minutes per side on non-complex cases generally will be allowed. After the Court and counsel have concluded *voir dire* of the panel, counsel may exercise challenges for cause outside the presence of the prospective jurors.

The exercise of peremptory challenges will follow. Counsel will exercise their respective challenges using the "blind strike" method. That is, each side will exercise their peremptory challenges simultaneously and confidentially by marking those jurors they wish to excuse on the provided strike sheet. Ms. Ortiz will collect the parties' strike sheets and, after reconciling those sheets, will inform the parties of the agreed-upon number of remaining (non-challenged) jurors.

6. *Bench Conferences*

Sidebar conferences are disfavored. If counsel desire to speak to the Court outside the jury's presence, counsel may request to do so at the start of a recess or at the end of the day. Requests to see the Court outside the presence of the jury when the Court is about to begin the day of trial or reconvene following a recess generally will not be granted. These matters usually can wait until the next recess.

7. *Exhibits*

Even if the parties stipulate to their admission, the Court will not receive into evidence any exhibits that have not been the subject of witness testimony.

8. *Other*

Refrain from talking to each other in the presence of the jury. If clarification on a matter is needed, please seek clarification from the Court and not directly from counsel.

C. *Generally Applicable Procedures*

1. *Trial Schedule*

Unless otherwise agreed, trials will be conducted from 9:00 a.m. to noon (the “morning session”) and 1:00 p.m. to 4:30 p.m. (the “afternoon session”) on Mondays through Thursdays, with one 15-minute break during both the morning and afternoon sessions. For trials lasting more than three days the Court may adopt a condensed schedule, where trial will be conducted from 8:45 a.m. to 3:15 p.m., with two 20-minute breaks.

2. *Presentation of Evidence*

Please abide by the following rules:

Do not enter the well, except during *voir dire*, opening statement, and closing argument.

Conduct all examinations of witnesses from the podium.

Feel free to approach witnesses during examination but first seek permission from the Court. Please keep your visit to the witness stand brief, *e.g.*, by quickly orienting a witness with an exhibit and returning to the podium.

Where a party has more than one lawyer, only one lawyer may conduct the examination of a given witness and that lawyer alone may make objections concerning that witness.

When objecting, state only the legal ground for the objection, *e.g.*, “Objection, hearsay,” or “Objection, Rule 802.” Speaking objections are not permitted unless the Court requests further information from counsel.

3. *Exhibits*

Counsel must meet and confer in advance of trial and waive the authentication requirement where the authenticity of a document is not at issue.

The Court modifies the manner of numbering trial exhibits set forth in Civil Local Rule 16.1(f)(2)(c) as follows: Rather than mark exhibits using alphabetic letters, defendant(s) must number their exhibits beginning at number 500 (or any other number agreed upon with opposing counsel).

Voluminous documents or exhibits must be culled of unnecessary pages so that only relevant pages, or pages supplying context to the relevant pages, are admitted. Counsel should use summaries or charts to prove the content of voluminous documents, writings, or recordings that cannot be conveniently examined in court. *See* Fed. R. Evid. 1006. Absent extraordinary circumstances and regardless of any stipulation by the parties, only those exhibits which have been referenced/utilized during trial will be provided to the jurors for their use during deliberations.

No later than seven (7) calendar days before the start of trial, the parties shall provide the Court with two copies of each exhibit, with each set of exhibits in a separate binder with tabs. So long as they are received no later than seven (7) calendar days before the start of trial, these exhibit binders may be mailed or hand-delivered to the Hon. Todd W. Robinson, c/o Clerk of the Court, 333 W. Broadway, Suite 420, San Diego, CA 92101. The parties shall maintain the original exhibits.

No later than seven (7) calendar days before the start of trial, the parties shall exchange any demonstrative exhibits that will be used during opening statements or during the testimony of any expert witness. Any objections to the demonstrative exhibits must be filed no later than three (3) court days before the first day of trial.

On the first day of trial, each party shall provide Ms. Ortiz with two (2) copies of its witness and exhibit lists in the form specified in Civil Local Rules 16.1(f)(2)(c) and (d). All exhibits must be pre-marked on the first day of trial. Exhibit stickers may be obtained from the Clerk of the Court or from Ms. Ortiz in advance of trial.

Before publishing an exhibit to the jury, counsel must move for admission of the exhibit and allow the Court to inquire whether the opposing side has any objection to the exhibit being received in evidence.

When referring to an exhibit, counsel should refer to its exhibit number whenever possible to keep a complete record.

If an exhibit is being used and counsel's view is obstructed, counsel may relocate for better viewing without requesting permission from the Court.

Revised September 16, 2024