

**Department V**  
**Courtroom Information**  
**and Guidelines**  
**Hon. Sarah J. Heidel**

**Judicial Assistant:** Robert Rully  
**Courtroom Assistant:** TBD  
**Courtroom Telephone:** (626) 293-2167  
**Court Address:** 150 West Commonwealth, Alhambra, CA 91801  
**Law and Motion:** Monday – Thursday 8:30 a.m.  
**Jury Trials:** Monday – Thursday, 10:00 a.m. to 4:15 p.m.  
The court is dark for trials on Fridays.

Department V is an independent/direct calendar court. Parties and counsel should review the provisions of the California Code of Civil Procedure, the California Rules of Court, and the Los Angeles Superior Court Local Rules, Chapter 3, Civil Division Rules (“Local Rules”) that apply to unlimited civil actions in independent calendar courts.

### **Case Management Conferences**

Case Management Conferences are held Monday through Friday 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.

### **Ex Parte Applications**

Ex parte applications will be considered Monday through Friday at 9:00 a.m. All Ex parte applications and documents in support thereof must be electronically filed no later than 10:00 a.m. the *court day before* the hearing. Any written opposition shall be electronically filed by 8:30 a.m. the day of the hearing.

Pursuant to California Rules of Court, rule 2.253(b)(2), self-represented litigants are exempt from these mandatory Electronic Filing requirements.

### **Discovery**

The Court requires all counsel to exhaust meet and confer efforts *before* filing a discovery motion. Upon a written request of counsel, the Court may conduct an informal discovery conference (IDC) to assist counsel in resolving discovery disputes informally. IDCs are held Monday-Thursday 2:30-3:30 p.m.

## **Law and Motion**

Law and motion hearings are conducted Monday through Thursday beginning at 8:30 a.m. Unless otherwise set by the court, summary judgment and summary adjudication motions will be heard on Tuesdays and Thursdays at 8:30 a.m.

No appearances are required for an OSC regarding proof of service if the required proof(s) has/have been filed with the court and the court has not set a monetary sanction hearing for the same date.

Parties must obtain a motion date via the online Court Reservation System (CRS) on the Los Angeles Court website “*LA Court Online, Court Reservation System,*” at [www.lacourt.org](http://www.lacourt.org) to reserve a date prior to filing any motion papers. Motion fee payments are required at the time reservations are made online.

### **Please do not call the courtroom to reserve a motion date.**

The Court does not provide a court reporter. If the parties bring their own court reporter, please consult the Court’s website to review procedures which must be followed.

Tentative rulings are available upon request at the time of the hearing and will also be posted on the Court’s website at [www.lacourt.org](http://www.lacourt.org).

If counsel wishes to submit any materials in support of a motion under seal, counsel must strictly comply with California Rules of Court Rule 2.551 et. seq.

## **Trial Preparation Order**

### **Final Status Conference**

Final Status Conferences will be held on Thursdays at 10:00 a.m.

Lawyers are advised to review Los Angeles County Court Rules 3.25(f),(g)&(h)

Only lawyers who are actually conducting the trial may appear for their respective party. Failure to follow this order WILL result in sanctions.

Trial counsel must attend the final status conference **in person**.

The parties must submit their physical trial binders to the courtroom *at least five court days in advance of the FSC*. At the FSC, counsel should be prepared to discuss all aspects of the trial.

Parties must meet and confer and submit the following documents five court days before the FSC.

#### Joint Exhibit List

Pursuant to California Rule of Court 3.1110(f) and Los Angeles County Superior Court Rules 3.52 and 3.53, all exhibits must be exchanged and pre-numbered, except for those anticipated in good faith to be used for impeachment or during rebuttal. Documentary exhibits consisting of more than one page must be internally paginated in sequential numerical order. Exhibits written in a foreign language must be accompanied by a certified English translation. Cal. Rule of Court 3.1110(g). Pursuant to Los Angeles County Superior Court Rules 3.97 and 3.180, the parties shall not publish to the jury any exhibits or graphics at any time during trial except after being marked and received into evidence, or with the court's permission. All demonstrative exhibits, not admitted into evidence, must be shown to the opposing party before use at trial. Any objections to the use of demonstrative exhibits must be brought to the court's attention in a timely manner and before publication to the jury.

#### Joint Witness List

All witnesses must be listed on one list. Do not repeat the name of a witness. Indicate the total time expected for that testimony, including direct, cross, and re-direct. At the end of the list, state the total time estimated for each witness's testimony.

#### Joint Jury Instructions

Submit a joint set of CACI instructions with all information filled in – no remaining brackets or blanks. If instructions are disputed, submit a separate set or sets indicating the party proposing and opposing the instruction. Submit a disposition table which lists all jury instructions by number, the identity of the party or parties proposing the instruction, and columns for the court to indicate whether the instruction is given, modified, withdrawn or refused.

#### Concise Joint Statement

This is brief, neutral description of the case to be read to the jury. In most instances, it should not exceed two paragraphs.

#### Mini Opening Statement

If the parties wish to make a mini opening statement prior to conducting their voir dire they must write out their brief statement and share it with opposing counsel. They will then be required to read their statement verbatim to the jury at the appropriate time.

#### Joint Proposed Verdict Form

If the parties cannot agree on the verdict form, each party must submit their own proposed verdict form. Any proposed special verdict should be in a form that is easily used and understood by the jury and which does not require the jury to answer unnecessary questions.

### Motions in Limine

Los Angeles County Superior Court Rule 3.57 requires the parties to meet and confer before filing any motion in limine. All motions in limine must be accompanied by a sworn declaration attesting that the subject of the motion has been discussed with the opposing party and setting forth the opposing party's position regarding the motion(s). Failure to include such a declaration will result in summary denial of MIL.

Motions in limine must be served on the opposing party and submitted to the court five court days prior to the FSC. A written opposition to a motion in limine may be served and filed no later than the FSC. Replies are not required but may be served and filed no later than the Friday preceding the trial date. As a reminder, motions in limine should not be used to seek summary judgment, summary adjudication of issues, or judgement on the pleadings.

The court does not rule on motions in limine until the first day of trial.

### Bench Trials

The parties must submit a joint exhibit list and joint witness list as described above.

### Compliance

Failure to submit any item required in this order in a timely manner without good cause may result in the imposition of sanctions, including monetary sanctions, exclusion of evidence, issue preclusion, denial of a claim or defense, dismissal, or default.