

**Courtroom Information for
Department A15**

Judge Daniel L. Alexander

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A. GENERAL

Department A15 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, including Local Rule 3.26 (Litigation Conduct) and Appendix 3.A. (Guidelines for Civility in Litigation).

Upon arrival, parties must check in with the courtroom assistant. Counsel must provide a business card that indicates the party he or she represents and the calendar matter number on which he or she is appearing. In lieu of a personal appearance in the courtroom, counsel may appear via LA CourtConnect. *See* Cal. Code Civ. Proc. § 367.75 and Cal. Rules of Court, rules 3.670 & 3.672.

If parties/counsel are going to be late for a hearing, please contact the court staff. For all other inquiries, please contact the court staff between 10:00 a.m. and 12:00 p.m. or between 2:00 p.m. and 5:00 p.m.

B. CASE MANAGEMENT CONFERENCES

Case Management Conferences are held Monday, Wednesday, and 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.

All defendants must be served with the complaint by the case management conference. If all defendants have not been served, plaintiff or plaintiff’s counsel must submit a declaration to the court five (5) days prior to the hearing explaining what efforts have been undertaken to accomplish service. Cal. Rules of Court, rule 3.110.

The Court requires counsel-of-record (*i.e.*, not appearance counsel) to attend the Case Management Conference.

C. LAW AND MOTION

Law and motion hearings are conducted Tuesday and Thursday beginning at 8:30 a.m. Moving parties must secure a hearing date via the online Court Reservation System (CRS) on the Los Angeles Superior Court website. Please see the “Online Services” section at www.lacourt.org to find the civil Court Reservation System to reserve a hearing date before filing any motion, except for motions *in limine*, which are heard on the first day of trial (normally a Friday with jury selection to begin the following Monday). Motion fee payments are required at the time reservations are made online. **Courtesy copies of all motion-related documents filed electronically must be delivered to Department A15 within one (1) court day of the electronic filing.**

D. INFORMAL DISCOVERY CONFERENCES

In the event a party seeks to file a motion to compel discovery at any time during the pendency of this action, the parties are required to meet-and-confer in good faith in person, by telephone, or by videoconference.

If the parties cannot resolve the issue, they are encouraged to schedule an IDC before filing any motion to compel. To schedule an IDC, contact the clerk in Department A15 for availability. At least five court days before the IDC, the parties shall file a joint report that succinctly sets forth the nature of the dispute, the necessity for the discovery, the justification for its non-production, and the overall status of discovery. The parties are encouraged to identify specific issues, along with a brief statement of the points and authorities they wish for the Court to consider, the resolution of which may resolve the discovery dispute. A courtesy copy of the report shall be delivered to the courtroom within one court day of the electronic filing. The Court generally holds IDCs Monday, Wednesday, and Friday unless the Court is in trial. The Court limits the number of IDCs to two per day.

In the event a motion to compel further responses is filed, the parties are required to submit a JOINT STATEMENT consisting of a four-column document set up as follows: The first column will identify the number of the discovery request; the second, the text of the discovery request; the third, the text of the response; and the fourth, brief bullet-point statements, one from each party, as to why a further response should or should not be compelled.

E. EX PARTE APPLICATIONS

Ex parte applications will be considered Monday through Friday at 8:30 a.m. Applicants must comply with California Rules of Court, rule 3.1200, *et seq.*, submit a proposed order, and pay the filing fee before appearing in court. The parties should not expect to present oral argument in connection with an *ex parte* application. *See* Cal. Code Civ. Proc. § 166, subd. (a)(1). The Court will inform the parties if it wishes to hear argument before ruling.

Ex parte applications are reserved for exigent circumstances. The applicant shall comply with Cal. Rules of Court, rule 3.1202(c): “An applicant must make an affirmative factual showing in a declaration containing competent testimony based on personal knowledge of irreparable harm, immediate danger, or any other statutory basis for granting relief *ex parte*.”

Because it is usually extremely difficult for the Court to advance the hearing on a motion for summary judgment or summary adjudication, if a party files an ex parte application to advance the hearing on such a motion because no hearing dates are available on the Court Reservation System before the trial date, the moving party should also consider including an alternative request that the Court continue the trial to a date after the hearing on the motion.

F. TRIAL PROCEDURES

Trials are scheduled for Friday at 8:30 a.m.

The Parties are to follow the civil trial procedure rules set forth in Local Rule 3.37, *et seq.*, as well as the rules for pretrial preparation contained in Local Rule 3.25.

Unless otherwise ordered, the following pre-trial filing and service deadlines apply. All deadlines for service are extended based on the manner of service as set forth in Code of Civil Procedure § 1013.

1. Final Status Conference (“FSC”) and Pretrial Filings

Final Status Conferences are conducted on Wednesday at 8:30 a.m. Trial counsel and self-represented litigants are ordered to appear in person at the final status conference. The parties are required to file the documents set forth in Local Rule 3.25(f) and (g) in advance of the FSC and should be familiar with Local Rules 3.48 through 3.58.

At least five (5) calendar days prior to the FSC, the parties/counsel shall serve and file the following trial readiness documents:

a. Trial Briefs – Each party shall file a trial brief succinctly identifying: (1) the claims and defenses subject to litigation, (2) the major legal issues (with supporting points and authorities), (3) the relief claimed and the calculation of damages sought, and (4) any other information that may assist the Court at trial.

b. Motions *in Limine* – The caption of each motion *in limine* shall concisely identify the evidence that the moving party seeks to admit or exclude. Parties filing more than one motion *in limine* shall number the motions consecutively. Parties filing opposition and reply briefs shall identify the corresponding motion number in the caption of their pages.

c. Joint Statement – For jury trials, the parties shall prepare a joint written statement of the case for the Court to read to the jury. The parties/counsel shall sign the joint statement.

d. Joint Witness List – The parties shall work together and file a joint list of all witnesses that each party intends to call, excluding impeachment and rebuttal witnesses. The joint witness list shall identify each witness by name, specify which witnesses are experts, estimate the length of direct examination, cross-examination, and re-direct examination of each, and include a total of the number of hours for all witness testimony. The parties shall identify all potential witness scheduling issues and special requirements. The parties/counsel shall sign the joint witness list.

e. Joint List of Proposed Jury Instructions – The parties shall jointly prepare and file a list of proposed jury instructions, organized in numerical order, specifying the instructions upon which all sides agree and the contested instructions, if any. The list of proposed jury instructions must include a space by each instruction for the Court to indicate whether the instruction was given. The parties/counsel shall sign the joint list of proposed jury instructions.

f. Jury Instructions (Joint and Contested) – The parties shall prepare a complete set of full-text proposed jury instructions. The parties shall prepare special instructions in a format ready for submission to the jury with the instruction number, title, and text only.

g. Joint Verdict Forms – The parties shall prepare and file a joint proposed general verdict form or special verdict form (with interrogatories). If the parties cannot agree on a joint verdict form, each party must separately file a proposed verdict form.

h. Joint Exhibit List – The parties shall prepare and file a joint exhibit list organized with columns identifying: (1) the exhibit, (2) which party is offering the exhibit, (3) whether there is a stipulation to authenticity and/or admissibility of the exhibit, (4) the date on which the exhibit was identified, and (5) the date on which the exhibit was admitted. Prior to filing the joint exhibit list, the parties shall meet-and-confer to determine whether they will stipulate to the authenticity and/or admissibility of each exhibit or whether there are objections to any exhibit. If there are stipulations, the parties shall note that in the respective column. If not, the objecting party shall specify all objections in the respective column. The parties/counsel shall sign the joint exhibit list.

i. Page and Line Designations for Deposition and Former Testimony – If the parties intend to use deposition testimony or former trial testimony in lieu of any witness’s live testimony, the parties shall meet-and-confer and jointly prepare and file a chart with columns for each of the following: (1) the page and line designations of the deposition or former testimony requested for use, (2) objections, (3) counter-designations, (4) any responses thereto, and (5) the Court’s rulings. The objecting party shall specify all objections in the respective column. The parties/counsel shall sign the designations.

j. Stipulations Concerning Ultimate Facts and Issues – The Court orders the parties to meet-and-confer concerning potential stipulations to the ultimate facts and issues.

2. Trial Binders

Counsel must provide a joint trial binder for the Court at the FSC. The trial binder shall be organized as follows:

Tab A:	Trial Briefs
Tab B:	Joint Statement of the Case
Tab C:	Joint Witness List
Tab D:	Joint List of Jury Instructions
Tab E:	Joint and Contested Jury Instructions

Tab F:	Joint and/or Contested Verdict Forms
Tab G:	Joint Exhibit List
Tab H:	Page and Line Designations for Deposition and Former Testimony
Tab I:	Stipulations

3. Motions *in Limine*

Motions *in limine* will be heard on the first day of trial (normally a Friday). Motions *in limine* are governed by the statutory notice requirements set forth in Code of Civil Procedure sections 1005(b) and 1013. When filing motions *in limine*, the parties must comply with Local Rule 3.57, including the required declaration, if applicable. At least five calendar days before the first day of trial, counsel must provide a tabbed binder containing all motions *in limine*, oppositions, and replies in sequential order consistent with the number assigned to each motion *in limine*. The binder also must contain a table of contents identifying each motion *in limine*, opposition, and reply, and the corresponding tab for each.

4. Exhibits

Pursuant to Local Rules 3.52 and 3.53, exhibits must be pre-marked using Arabic numerals and in instances where exhibits consist of multiple pages, each page must be numbered sequentially. The exhibits must be exchanged at least five calendar days before the FSC and lodged with the Court on the first day of trial. At least three sets of exhibit binders – tabbed and paginated – are required on the first day of trial: a set each for the Court, the judicial assistant, and the witness. Counsel must also supply an exhibit binder to each opposing party.

Parties should be familiar with Local Rule 3.148, *et seq.*, regarding trial exhibits, including, but not limited to, Rule 3.152 (requiring exhibits to be moved into evidence as soon as the evidentiary foundation for their admission has been established), Rule 3.155 (governing publication of exhibits to jurors), and Rule 3.158 (use of depositions, interrogatories, and requests for admissions).

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5. Non-Compliance

The parties should be familiar with Code of Civil Procedure section 575.2(a) (setting forth penalties for failure to comply with the Local Rules) and Local Rules 3.10 and 3.25(f)(1). Local Rule 3.10 authorizes the imposition of sanctions for failure or refusal to comply with the Local Rules and any Court order entered pursuant to those rules, and incorporates the sanctions set forth in the Code of Civil Procedure, California Rules of Court, and Government Code. Further, Local Rule 3.25(f)(1) states that failure to exchange and file the pretrial items set forth above may result in the exclusion of witnesses and evidence at trial, or waiver of jury trial.

Dated: December 7, 2023



Daniel L. Alexander
Judge of the Superior Court