

## **COURTROOM INFORMATION**

### **DEPARTMENT 52**

JUDGE: Jerrold Abeles

COURTROOM ASSISTANT: Tony Isunza

JUDICIAL ASSISTANT: Samantha Holman

TELEPHONE NUMBER: (213) 633-0652

LOCATION: Department 52, Room 510, 5<sup>th</sup> Floor, Stanley Mosk  
Courthouse, 111 N. Hill Street, Los Angeles, CA 90012

Welcome to Department 52. The court appreciates attorneys and self-represented parties taking the time to read and comply with the policies and procedures set forth below.

#### **1. Civility and Professionalism**

The court places a very 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 civility, courtesy, and professionalism, both inside and outside the courtroom. The court expects all attorneys and parties to grant reasonable requests for professional courtesies, such as requests for reasonable extensions of time for deadlines to respond to pleadings, discovery, or other matters.

The Los Angeles County Bar Association has adopted “Guidelines for Civility in Litigation,” which the Los Angeles Superior Court has adopted as civility in litigation recommendations to members of the bar. (Los Angeles Superior Court Local Rules, Rule 3.26, Appendix 3.A.) The court expects all attorneys and parties to read and to follow those guidelines.

## **2. Settlement**

While some cases need to be tried, most cases can and should be resolved without the need for trial. “There is a strong public policy in the State of California to encourage the voluntary settlement of litigation.” (*Pearson v. Superior Court* (2012) 202 Cal.App.4<sup>th</sup> 1333, 1339.) The court believes that it is in the best interests of the parties to settle their cases at an early stage to avoid the time, expense, uncertainty, and risk of trial.

Toward that end, at the Case Management Conference, the court may issue an order requiring the parties and their counsel to (1) hold a meeting to discuss settlement or (2) attend a court affiliated alternative dispute resolution (ADR) program. A chart outlining these programs is posted on the Department’s webpage. Alternatively, if the parties stipulate to hold a mediation with a private mediator, the court will order the parties to hold a mediation. The court expects the parties’ counsel and any self-represented parties to discuss before the Case Management Conference, and to be prepared to address at the Case Management Conference, whether the parties will stipulate to an ADR program or private mediation and, if so, what deadline the court should set for completion of the mediation or mandatory settlement conference.

## **3. Motions**

All motion hearing dates must be reserved in advance on the Court Reservation System at [www.lacourt.ca.gov](http://www.lacourt.ca.gov) under “Online Services,” “Courtroom Services,” “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. For most motions, courtesy paper copies are unnecessary. If the parties believe courtesy paper copies will assist the court, they may lodge them with the court.

#### **4. Motions for Summary Judgment/Adjudication**

Any party who intends to file a motion for summary judgment or summary adjudication must reserve a hearing date immediately because the reservation dates for such motions are limited on the Court Reservation System, they fill up fast, and the present reservation dates available for such motions are very close to the trial dates being set by the court. Do not wait until discovery has been completed to reserve a hearing date for a motion for summary judgment or summary adjudication because, at a later date, hearing dates might not be available at least 30 days before the trial date set in your case.

#### **5. Ex Parte Applications**

Ex parte applications are heard at 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. The vast majority of ex parte applications are denied without a hearing because the applicant does not present a true emergency justifying ex parte relief. Only under extraordinary circumstances will ex parte relief be granted.

If the parties stipulate to an order, there is no need to file an ex parte application. The parties may instead file a stipulation and proposed order. The court generally promptly decides whether to grant stipulated proposed orders.

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. . . .

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.

## **6. Court Reporters**

Because Department 52 is dedicated to unlimited jurisdiction civil cases, the services of an official court reporter are not available for hearings or trials in Department 52, 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.

## **7. 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 court expects the parties' counsel and any self-represented parties to meet and confer – preferably in person or by telephone – to make a reasonable and good faith attempt to informally resolve each discovery issue in dispute. If the parties still cannot resolve their differences, they may request the court to hold an informal discovery conference. The court grants some but not all such requests. In the court's experience, an informal discovery conference is useful if there are a few discrete issues the parties genuinely dispute. Typically, the court limits the discussion to three main issues.

To request an informal discovery conference, please complete Los Angeles Superior Court form LACIV 094, lodge it in Department 52, and reserve a hearing date on the Court Reservation System, which will reflect "Confirmed" upon approval by the court.

The court requires the parties' counsel and any self-represented parties, with full authority to enter into a stipulation to resolve the discovery disputes at issue, to participate in the informal discovery conference with the court. Because an informal discovery conference is not a hearing on a motion, the court normally does not make any orders at the informal discovery conference unless the parties stipulate.

## **8. Trial Preparation Order**

Department 52 has a Trial Preparation Order that 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.

## **9. Electronically Lodged Documents That Require Action by the Court**

The court requests that, after the parties' counsel or any self-represented parties electronically lodge a document that 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 often as possible).

## **10. Song-Beverly Consumer Warranty Act cases**

Most discovery disputes in Song-Beverly Consumer Warranty Act (Song-Beverly) cases should be resolved by following the procedures and requirements of Code of Civil Procedure section 871.26. The court expects the parties to schedule a mediation within the time required by Code of Civil Procedure section 871.26, subdivision (d).

In the court's experience, after a settlement has been reached in a Song-Beverly case, the court often holds unnecessary hearings before the plaintiff dismisses the case. To avoid such hearings, the parties are strongly encouraged to include in their settlement agreements stipulations for the court to retain jurisdiction to enforce the terms of the settlement pursuant to Code of Civil Procedure section 664.6, subdivision (a). The parties may then file a stipulation

and proposed order that (1) dismisses the case and (2) states that upon dismissal, the court shall retain jurisdiction to enforce the terms of the settlement.

The parties shall not file a notice of settlement unless the settlement agreement has been fully executed. Upon the filing of a notice of conditional settlement, the court usually issues an order to show cause as to why the court should not dismiss the action without prejudice pursuant to Code of Civil Procedure section 664.6, subdivision (e).

If a party accepts an offer to allow judgment pursuant to Code of Civil Procedure section 998, that party should immediately file proof of acceptance and a proposed judgment.

#### **11. Filings shortly before a hearing**

The court carefully reads and prepares for each hearing, often taking detailed type-written notes. Sometimes documents electronically filed a day or two before a hearing are not accessible to judicial officers on the day of the hearing. For these reasons, the court highly discourages last-minute filings.

07/22/2025

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT  
DEPARTMENT 52**

	}	Case No. _____
Plaintiff(s),	}	TRIAL PREPARATION ORDER
v.	}	
	}	
Defendant(s).	}	

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

**1. MEET AND CONFER**

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

No later than 11 calendar days before the Final Status Conference, the parties' counsel and any self-represented parties shall meet and confer to do the following: (1) discuss and prepare the documents required in Sections 2.B-H, below, and the Motions in Limine Binder, Exhibit Binders, and Trial Binder required in Sections 3-5, below, (2) discuss and make a good faith effort to stipulate to the authenticity and admissibility of each trial exhibit, (3) discuss and make a good faith effort to stipulate to resolve each motion in limine, (4) discuss and make a good faith effort to stipulate to ultimate facts and legal issues, and (5) discuss and make a good faith effort to settle the case.

**2. TRIAL DOCUMENTS TO BE FILED**

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



**A. TRIAL BRIEFS (OPTIONAL)**

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

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

**B. JOINT WITNESS LIST**

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

JOINT WITNESS LIST						
Name (State if Expert)	Party Calling (II/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)


There is no need to make objections to any witness on the joint witness list. The parties do not waive or preserve objections on the joint witness list.

### 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) that state, as to each exhibit any party intends to offer at trial: (1) the exhibit number (not letters), (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) the date the exhibit was marked for identification, and (7) 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)	Date marked for ID	Date Admitted

There is no need to make specific objections on the joint exhibit list. The parties do not waive or preserve objections on the joint exhibit list.

### 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).) A joint statement should usually be only a few sentences. It should be in plain English without legal jargon.

**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) that 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 (II/Δ)	Agreed or Contested	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, brackets, and other irrelevant or inapplicable material. 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 court rarely uses a special jury instruction on a topic covered by a CACI instruction. Special jury instructions that use quotes from appellate cases taken out of context, or that do not use plain English, are usually not appropriate.

1 The court's practice is to keep a working list of all jury instructions it intends to give as of the  
2 first day of trial. The parties should not request CACI instructions that do not apply when the trial  
3 begins. For example, CACI 5013 shall not apply unless and until there is a deadlocked jury. During  
4 trial, if circumstances change, the parties may request additional applicable jury instructions.

5 The court generally does not give the jury redundant instructions. For example, CACI 105  
6 and CACI 5001 are the same. Unless unusual circumstances warrant otherwise, the court shall only  
7 give this instruction once.

#### 8 9 **G. VERDICT FORM(S)**

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

#### 16 17 **H. JOINT CHART OF PAGE AND LINE DESIGNATIONS FOR** 18 **DEPOSITION AND FORMER TESTIMONY**

19 If any parties intend to use deposition testimony or former trial testimony in lieu of or in  
20 addition to a witness's live testimony, the parties' counsel and any self-represented parties shall meet  
21 and confer to discuss, and work together to prepare and file, a joint chart in the format set forth below  
22 (Joint Chart of Page and Line Designations for Deposition and Former Testimony). The parties do  
23 not, however, need to include in the joint chart deposition testimony or former trial testimony they  
24 plan on using for impeachment purposes only.

25 In the joint chart, each designating party's designations of deposition or former testimony  
26 shall include columns that state: (1) the designation number and name of the witness, (2) the date and  
27 type of testimony (*e.g.*, deposition or trial testimony), (3) the page and line designations of the  
28 deposition or former testimony requested to be used, (4) any objections, (5) whether the other party

has counter-designated any additional deposition or former testimony of the witness that relates to the designation, and, if so, the designation number of the counter-designation, and (6) the court's ruling.

In the joint chart, each counter-designating party's counter-designations of additional deposition or former testimony of the witness that relates to the designations shall include columns that state: (1) the designation number and name of the witness, (2) the date and type of testimony (e.g., deposition or trial testimony), (3) the page and line counter-designations of the deposition or 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 attach copies of the pages of the transcripts of the deposition or former testimony they are designating or counter-designating to the Joint Chart of Page and Line Designations for Deposition and Former Testimony, 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**

<b>Number/ Witness Name</b>	<b>Date/Type of Transcript</b>	<b>Page:Line Designation</b>	<b>Objections</b>	<b>Is There a Counter? (Yes/No/#)</b>	<b>Ruling</b>
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**

<b>Number/ Witness Name</b>	<b>Date/Type of Transcript</b>	<b>Page:Line Designation</b>	<b>Objections</b>	<b>What # Does This Counter?</b>	<b>Ruling</b>
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	
<b><u>Plaintiff's Counter-Designations</u></b>					
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. 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 Local 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 three calendar days before the Final Status Conference, the parties' counsel and any self-represented parties shall jointly prepare and lodge in Department 52 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.

The parties should not file generic motions in limine untethered to actual anticipated disputes about evidence. Motions in limine that seek rulings "which would merely be declaratory of existing law" and do not include a discussion about the particular evidence the moving party seeks to exclude are not appropriate. (*Kelly v. New West Federal Savings* (1996) 49 Cal.App.4th 659, 670-671.)

1  
2 **4. EXHIBIT BINDERS**

3 The parties' counsel and any self-represented parties shall work together to jointly prepare at  
4 least five *identical* sets of tabbed, exhibit binders organized numerically in three-ring binders (Exhibit  
5 Binders): a set for the court, a set for the Judicial Assistant, a set for the witnesses, and a set for each  
6 party. Copies of documentary exhibits shall be one-sided copies. The parties' counsel and any self-  
7 represented parties shall bring one set of the Exhibit Binders to the Final Status Conference for the  
8 court to review.  
9

10 **5. TRIAL BINDER**

11 No later than three calendar days before the Final Status Conference, the parties' counsel and  
12 any self-represented parties shall jointly prepare and lodge in Department 52 a physical Trial Binder,  
13 consisting of one-sided, conformed copies, tabbed and organized in a three-ring binder with a table of  
14 contents that includes the following (for trials by the court without a jury, the Trial Binder shall only  
15 include the documents listed under Tabs A, B, C, H, and I):

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

17 Tab B: Joint Witness List

18 Tab C: Joint Exhibit List

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

20 Tab E: Joint List of Jury Instructions

21 Tab F: Joint and Contested Jury Instructions

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

23 Tab H: Joint Chart of Page and Line Designations for Deposition and Former  
24 Testimony

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

27 The parties shall organize proposed jury instructions into groups behind Tab F in the  
28 following order (labeled by cover sheets): (1) the agreed-upon instructions, (2) plaintiff's requested

1 instructions to which defendant objects, and (3) defendant's requested instructions to which plaintiff  
2 objects.

3  
4 **6. FAILURE TO COMPLY WITH TRIAL PREPARATION ORDER**

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

8  
9 IT IS SO ORDERED.

10  
11 Dated: \_\_\_\_\_

\_\_\_\_\_  
12 Jerrold Abeles  
13 JUDGE OF THE SUPERIOR COURT  
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22 Updated July 11, 2025  
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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

**CASE NO.** \_\_\_\_\_

Plaintiff(s),

vs.

Defendant(s).

**STIPULATION AND ORDER RE:  
SETTLEMENT CONFERENCE  
WITH TRIAL JUDGE**

1. The parties stipulate, through their undersigned counsel, that a settlement conference may be conducted in this case by Judge Jerrold Abeles.
2. The parties stipulate that above-stated judge may conduct the settlement conference as he finds appropriate, including discussing all aspects of the case candidly with counsel and/or the parties.
3. The parties stipulate that the above-stated judge may discuss the case privately with counsel for any side, with or without their clients present.
4. The parties stipulate that above-stated judge may discuss the case privately with the parties on any side without their counsel present.
5. The parties acknowledge that this stipulation allows above-stated judge to review the probable evidence, offer evaluations of the strength of the evidence or of its admissibility, offer evaluations of the applicable law, offer an evaluation of damages, and take any other steps or apply any other settlement techniques he finds appropriate.
6. The parties acknowledge that if the case is not settled, trial of the case may be conducted by above-stated judge.
7. The parties stipulate that nothing that is said, and nothing that occurs, during or as a consequence of the settlement conference will later constitute, or be cited as, a basis for disqualification of the above-stated judge as the trial judge.

**Date:** \_\_\_\_\_

\_\_\_\_\_  
Signature of Attorney for Plaintiff

\_\_\_\_\_  
Signature of Plaintiff

\_\_\_\_\_  
Signature of Attorney for Defendant

\_\_\_\_\_  
Signature of Defendant

\_\_\_\_\_  
Judge of the Superior Court