

DEPARTMENT 529 COURTROOM INFORMATION

JUDGE: Virginia Keeny

JUDICIAL ASSISTANT: Peter Boyadzhyan

COURTROOM ASSISTANT: Joy Baltazar

LOCATION: 5th Floor, Stanley Mosk Courthouse

111 North Hill Street, Los Angeles, CA 90012

TELEPHONE NUMBER: (213) 633-0645

COURTROOM HOURS: 8:30 a.m. to 4:30 p.m. Courtroom closed during lunch hours: 12:00 p.m. - 1:30 p.m.

PRE-TRIAL INFORMATION

EX PARTE: Ex parte applications are heard Monday through Friday at 8:30 a.m. and must comply with California Rule of Court 3.1200 et. seq. Ex parte applications are reviewed in chambers. Oral argument will be considered at the discretion of the Court.

CONTINUANCES: Requests for continuances of hearings or trials may be considered upon written stipulation and order. The stipulation must set forth the grounds showing good cause for a continuance. If there is no stipulation, any party may seek a continuance by noticed motion or ex parte application. The court will not continue a hearing or trial if there is opposition without a showing of good cause.

CASE MANAGEMENT CONFERENCES: Counsel are expected to comply with the requirements of CRC 3.722 et. seq. regarding case management conferences. A case management statement must be filed at least fifteen (15) days prior to the hearing as required by CRC 3.725(a). 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 at least five (5) days prior to the hearing explaining what efforts have been undertaken to accomplish service. CRC 3.110. Failure to comply with the Rules of Court relating to Case Management Conferences and service of the complaint may result in the court setting an Order to Show Cause why monetary sanctions should not be imposed pursuant to Cal. Rule of Court 2.30 and C.C.P. Section 177.5.

Jury fees should be posted by the time of the case management conference pursuant to CCP Section 631.

TELEPHONIC/REMOTE APPEARANCES: LACourtConnect is available for video and telephonic appearances as permitted by CRC 3.670. Court proceedings will commence promptly at 8:30 a.m. Late check-ins may miss the Court calling their matter or may be called at the end of the calendar. If you intend to appear remotely, it is your responsibility to check-in remotely by 8:30 a.m. Please see the Court's website for further details regarding LACourtConnect.

Please comply with CRC 3.672 to give notice of intent to appear remotely. The court encourages parties who appear remotely to turn on their camera if available as it is of great assistance to the Court and court reporter (if present). If you are having trouble connecting through LACourtConnect or cannot be heard by the court, telephone Department 529 and advise the CA/JA of the problem.

CIVILITY: The court expects counsel to be familiar with and abide by the Guidelines for Civility in Litigation, Appendix 3A to the Los Angeles County Court Rules

COURT REPORTERS: The court no longer provides a court reporter. If counsel wishes to have the hearing reported, they are responsible to arrange for a reporter to be present at the hearing. A party with a fee waiver is entitled to a court reporter pursuant to Cal. Rule of Court 2.956(b)(3), if a request is made at least 10 calendar days prior to the hearing on court form LACIV269. Please refer to the SCLAC website for further information regarding court reporters.

MOTIONS: The court hears motions Monday through Friday at 8:30 a.m. The court expects counsel and self-represented parties to be familiar with and abide by the California Code of Civil Procedure and the California Rules of Court with respect to the format and filing of all motions. Failure to comply with the relevant sections or rules may result in denial of the motion and/or sanctions.

You must reserve a hearing date for any motion through the court reservation system.

All parties to a motion must place the reservation number associated with the motion on each document associated with that motion.

The court will post a tentative ruling on most motions the afternoon prior to the hearing. Counsel may submit to the court's tentative ruling by emailing the court at SMCDept529@lacourt.ca.gov by 8:00 a.m. the day of the hearing, indicating the case name and number and copying all counsel on the email. If all counsel submit, the court will adopt the tentative as the final order.

INFORMAL DISCOVERY CONFERENCES: The court does not require that parties schedule an Informal Discovery Conference (IDC) before they file a motion to compel. Parties are required to meet and confer prior to filing a motion to compel and they may request an IDC with the Court if they are unable to resolve their discovery dispute. To schedule an IDC, counsel or parties must meet and confer on a date and jointly telephone the courtroom to request a mutually agreeable date. IDCs are conducted at 1:30 p.m. on Mondays, if availability exists on the Court's calendar. At least five court days prior to the IDC, the parties must separately file a brief of no more than 5 pages (without attachments), setting forth the issue(s) in dispute and their respective positions.

Pursuant to CRC 3.1304(b), the moving party on a motion must notify the court immediately if the motion is going off-calendar or is being continued. If the motion is taken off calendar, please remove the motion from the court reservation management system.

TRIAL PROCEDURES

Trials are set for Mondays at 9:30 a.m. Final status conferences are usually set for the Friday, ten days prior to the trial date, at 9:30 a.m. Once trial commences, the court typically hears testimony from 10:00 a.m. to noon and from 1:30 to 4:30 p.m. with a 15-minute break in the afternoon.

The court no longer provides court reporters for trial. If any party wishes to have the trial reported, they are responsible to arrange for a reporter to be present for the trial at their expense. RealTime reporting is preferred.

Should the parties not provide a court reporter, the parties will be required to provide a joint summary of the testimony and evidence admitted each day for the court's use in preparing a settled statement for appeal purposes. The parties must submit the joint summary for the prior day's testimony no later than 8:30 a.m. on the following day of trial.

If a party or witness requires an interpreter, counsel must notify the Court at the FSC and submit a request to the interpreter's office. See the SCLAC website for further information regarding interpreters.

FINAL STATUS CONFERENCE

Counsel are expected to comply with all applicable statutes and rules, including, but not limited to, SCLAC Rule 3.25(f), in preparation for the Final Status Conference. Counsel who will try the case must be present for the final status conference unless the Court orders otherwise.

Pursuant to SCLAC Rule 3.25(f)(1), trial documents, including a statement of the case, exhibit list, witness list, jury instructions and verdict form must be filed with the court and served on opposing counsel five (5) days prior to the final status conference. Pursuant to SCLAC Rule 3.25(f)(2), motions in limine must be filed with the appropriate statutory notice for hearing at the final status conference. Motions in limine must comply with SCLAC Rule 3.57.

TRIAL WITNESSES

The parties' counsel and any self-represented parties shall work together to prepare and file a joint witness list, excluding impeachment and rebuttal witnesses. The joint witness list shall be organized with columns in the format set forth below:

JOINT WITNESS LIST						
Name (State if Expert or if interpreter required and required language	Party Calling (II/A)	Actually Expected to Testify? (yes/no)	Brief Description of Testimony	Length of Direct & Redirect (in hours)	Length of Cross (in hours)	Total Length (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. Absent good cause, the total number of hours listed for testimony should not exceed the trial estimate given at the case management conference, including the allocation of 1 day for jury selection. Any witness who is not included on the joint witness list may be excluded from testifying at trial except for true 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 of good cause to the court.

Counsel are expected to be prepared with enough witnesses to use the entire court day until they rest their case. Absent unusual circumstances, breaks or early recesses will not be permitted due to witness unavailability. The court will make an effort to accommodate the scheduling needs of expert witnesses, professionals, out-of-state witnesses, or others if the circumstances warrant.

By the conclusion of each court day, counsel are ordered to advise opposing counsel of the witnesses to be called the next day and the order in which they will testify.

EXHIBITS

Each party must prepare an exhibit list with columns in the format set forth below:

JOINT EXHIBIT LIST							
No.	Description	Offered by (n/4)	Stipulate to Authen.? (yes/no)	Stipulate to Admiss.? (yes/no)	Evidentiary Objections	Date marked for ID	Date Admitted

Counsel should agree in advance that their respective party will have a range of exhibit numbers, i.e., plaintiff 1-99; defendant 100-199. Each exhibit must be separately identified. Subparts to an exhibit, i.e., IA, IB, etc., must also be identified and listed separately. Bulk exhibits, e.g., voluminous medical records, will not be permitted. Counsel must separately mark and identify the specific items within a bulk exhibit. Blow-ups of portions of exhibits should be identified and marked as sub-part A. Typically, a blow-up will not be admitted into evidence. Each page of a multi-page exhibit must be consecutively paginated.

Counsel are ordered to exchange exhibits at the time of the Final Status Conference unless the court and counsel agree otherwise. Typically, at least five (5) copies of all exhibits, in a 3-ring binder, should be provided on the first day of trial. The original exhibits, those that will be provided to the jury, will be placed in the custody of the judicial assistant. Additional binders must be provided for: (1) the Court; (2) the witness; (3) opposing counsel; and (4) yourself. Once the exhibits are marked and admitted, they will remain in the custody of the court but will be available to counsel for their use during the trial. If counsel plan to admit media such as video or audio tapes,

counsel must raise the issue at the final status conference. Counsel are directed to the SCLAC website for information regarding use of the "Smart Tables" during trial. Counsel are urged to stipulate in advance to the foundation of documents and if possible, their admissibility.

JURY INSTRUCTIONS

At the Final Status Conference, counsel will be ordered to meet and confer regarding jury instructions. On the first day of trial, plaintiff's counsel will be required to submit those jury instructions that the parties have jointly agreed to, edited to conform to the specifics of the case. Each counsel is responsible to submit those additional instructions requested by them and not agreed to by opposing counsel, edited to conform to the specifics of the case. All instructions must be submitted on perforated paper forms.

Counsel are urged to agree upon a special verdict form to be submitted to the court with the other trial documents five (5) days prior to the final status conference. If counsel cannot agree, the Court will prepare a general verdict form.

COURTROOM DECORUM

Counsel are expected to follow the requirements of SCLAC Rules 3.92 through 3.183. Counsel are expected to arrive promptly each morning at the time designated by the court the night before. Any anticipated disputes or evidentiary issues should be raised with the court as soon as counsel arrive in the morning. Sidebars during the trial are discouraged. Counsel should state only the legal basis for an objection to evidence

ALTERNATIVE DISPUTE RESOLUTION

The court encourage the parties to use alternative dispute resolution procedures to resolve their dispute outside of court. Counsel and self-represented parties should be prepared at the CMC and at all subsequent status conferences and at the FSC to discuss their efforts to resolve the case. The court encourages parties and counsel to consider the various ADR programs offered by the SCLAC in conjunction with local bar groups and non-profit organizations. Please see the attached list of ADR programs available to civil litigants in our county.

SETTLEMENT PROGRAMS -The Superior Court of Los Angeles County has a variety of settlement programs. Litigants should closely review the requirements for each program and the types of cases served.

CIVIL MEDIATION VENDOR RESOURCE LIST

Litigants may use the Civil Mediation Vendor Resource List to arrange voluntary mediations without Court referral or involvement. The Resource List includes organizations that have been selected through a formal process that have agreed to provide a limited number of low-cost or no-cost mediation sessions with attorney mediators or retired judges. Organizations may accept or decline cases at their discretion. Mediations are scheduled directly with these organizations and are most often conducted through videoconferencing. The organizations on the Resource List target active civil cases valued between \$50,000-\$250,000, though cases outside this range may be considered. For more information and to view the list of vendors, download the Resource List Flyer and FAQ Sheet at www.lacourt.ca.gov/ADR/programs.html.

MEDIATION VOLUNTEER PANEL (MVP)

Cases referred to the Court's Mediation Volunteer Panel (MVP) are eligible for three hours of virtual mediation at no cost with a qualified mediator from the MVP. Through this program, mediators volunteer preparation time and three hours of mediation at no charge. If the parties agree to continue the mediation after three hours, the mediator may charge their market hourly rate. When a case is referred to the MVP, the Court's ADR Office will provide information and instructions to the parties. The Notice directs parties to meet and confer to select a mediator from the MVP or they may request that the ADR Office assign them a mediator. The assigned MVP mediator will coordinate the mediation with the parties. For more information or to view MVP mediator profiles, visit the Court's ADR webpage at www.lacourt.ca.gov/ADR or email ADRCivil@lacourt.ca.gov.

MEDIATION CENTER OF LOS ANGELES (MCLA) REFERRAL PROGRAM

The Court may refer cases to low-cost mediation through a formal contract with the Mediation Center of Los Angeles (MCLA), a nonprofit organization that manages a panel of highly qualified mediators. The Court's ADR Office will provide the parties with information for submitting the case intake form for this program. MCLA will assign a mediator based on the type of case presented and the availability of the mediator to complete the mediation in an appropriate time frame. MCLA has a designated fee schedule for this program. For more information, contact the Court's ADR Office at ADRCivil@lacourt.ca.gov.

RESOLVE LAW LA (RLLA) VIRTUAL MANDATORY SETTLEMENT CONFERENCES

Resolve Law LA provides three-hour virtual Mandatory Settlement Conferences at no cost for personal injury and non-complex employment cases. Cases must be ordered into the program by a judge pursuant to applicable Standing Orders issued by the Court and must complete the program's online registration process. The program leverages the talent of attorney mediators with at least 10 years of litigation experience who volunteer as settlement officers. Each MSC includes two settlement officers, one each from the plaintiff and defense bars. For more information, visit <https://resolvelawla.com>.