

## **Civil Cases Trial Checklist**

- Discovery **must** be completed by the formal pre-trial.
- MIL **must** be filed 28 days before the trial. Be prepared to discuss evidentiary issues.
- Any last-minute depositions (last 21 days before trial) can only be done with leave of Court. Those depositions include but are not limited to: rescheduled depositions, treating doctors, expert witnesses etc. (essentially no exceptions)
- Parties should submit and file jury instructions including interrogatories at the time of the formal pre-trial. Special instructions should include the OJI provision. This Court rarely includes non-OJI instructions unless the parties jointly agree.
- Two business days before the trial the parties should also submit JOINT (collaborative) instructions. The joint instructions should be in Times New Roman 12 pt. font in Word sent by email to the Staff Attorney. Controversial instructions or objections should be offset by highlights.
- Parties need to check exhibits and make sure everything is filed with the Clerk that needs to be filed with courtesy copies. Make sure there are no (even inadvertent) surprises for opposing counsel and the judge. The judge needs a transcript of all video depositions going to a jury. Provide a bench book with exhibits for the judge (jury and bench trials).
- Arrange technology and test it in advance of the trial.
- Because we have a heavy criminal docket assume the trial will take a little longer than you assume. If you have the possibility of a scheduling conflict (or your clients) we will move it.

**Failure to do any of the above may result in the Court rescheduling the trial for lack of preparation.**