

EXHIBIT A

Additional Pre-Trial Guidelines for Division 35 Judge Patricia Strowbridge

A. EXPERT WITNESS DISCLOSURE:

1. Not later than 90 days before the date of the pretrial conference, Plaintiff(s) shall disclose all expert witnesses (including treating physicians) that in good faith Plaintiff(s) actually intends to call at trial.
2. Not later than 60 days before the date of the pretrial conference, Defendant(s) shall disclose all expert witnesses (including treating physicians) that in good faith Defendant(s) actually intends to call at trial.

B. SCHEDULING OF MOTIONS IN LIMINE

Motions in Limine must be scheduled and heard no later than one week prior to the beginning of the trial period. No Motions in Limine will be heard during the trial period, absent a showing of good cause. Motions in Limine based upon legal argument shall follow the procedures outlined in the Order Establishing Procedures for Hearings and Rulings on Motions in Limine, attached here behind the Pre-Trial Checklist and Order Controlling Trial.

C. JURY INSTRUCTIONS (ADDITIONAL GUIDELINES):

The parties shall exchange proposed jury instructions and verdict forms not later than (10) days before the trial period is to commence. A copy of the proposed jury instructions and verdict forms shall be forwarded to the court in hard copy and on CD or flash drive in Word format, no later than seven (7) days before trial is to commence. All jury instructions and verdict forms are to be in Times New Roman, 14 point font.

D. APPEARANCE AT PRETRIAL CONFERENCE

Unless excused by prior order, lead counsel and each unrepresented party shall appear at the Pre-Trial Conference. Failure of counsel and/or parties to prepare, sign and file a Joint Pre-Trial Statement prior to the Pretrial Conference may result in sanctions. Witness lists and Exhibit lists are to be exchanged **prior** to the Pretrial Conference. The Joint Pretrial Statement shall have all parties' witness lists and exhibit lists, with specific objections properly noted, **attached**. The failure of counsel and/or parties to specifically note objections to the Exhibit lists attached to the Joint Pretrial Statement shall result in all objections being deemed **waived**, unless addressed in an Order on Motion in Limine.

E. DELIVERY OF VOLUMINOUS DOCUMENTS

All filings being delivered to chambers which exceed fifty (50) pages in total length, including attachments, except deposition transcripts, shall be provided in digital format on a flash drive. References to case law and statutes within the filing shall be searchable, OR shall include a table of contents specifying the location of the attached case in the digital document.

F. PRE-TRIAL CHECKLIST AND ORDER CONTROLLING TRIAL

The parties are required to jointly fill out one copy of the “Pre-Trial Checklist and Order Controlling Trial” (attached) and bring it with them to the Pre-Trial Conference.

G. DEPOSITION DESIGNATIONS

A party wishing to designate portions of a deposition for use at trial must follow this procedure:

1. A hard copy of the deposition transcript must be attached to a Notice of Intent to Use Deposition Designation at Trial, outlining “pages” and “lines” being designated, and must be delivered to lead counsel for each represented party, all Pro se parties, and the Court at least twenty (20) days before the start of the trial. Do NOT designate lines containing objections or attorney discussions regarding objections.

The deposition transcript will have yellow highlighter on the page and line numbers of the designations. (See attached example.)

2. Objections and Counter Designations must be filed and a hard copy delivered to lead counsel for all represented parties, all Pro se parties, and the Court, at least ten (10) days before the start of the trial. Objections will have case citations as appropriate.
3. Response to Objections, Objections to Counter Designations and Additional Designations must be filed and hard copy delivered to lead counsel for all represented parties, all Pro se parties, and the Court, at least five (5) days before the start of the trial. Objections will have case citations as appropriate.

Deposition questions that were not objected to at the time of the deposition may **not** be objected to in response to Designations or Counter Designations. Objections that were made during the deposition are limited to the grounds stated on the record during the deposition.

1 like fifteen hundred an hour.

2 Q Okay. And is that the same thing that you
3 charge the defense for their deposition of you two
4 weeks ago?

5 A I assume it is, yes.

6 Q Okay. Doctor --

7 A Actually, I take that back. 'Cause I
8 think this is a video deposition. I think we
9 charge differently for that.

10 Q All right. So you charge a little bit
11 more for video?

12 A Yeah. I don't -- There's a price sheet
13 here that you can -- I don't really know what my
14 prices are.

15 Q You don't set the charges?

16 A No, I don't.

17 Q All right, fine.

18 And I think you said before, we didn't
19 refer Ms. to you, she came to you through
20 Dr. and then then, initially, the
21 emergency room?

22 MR. : Object to the form.

23 Q Is that accurate based on the history that
24 you have?

25 MR. : Same objection.