

## **EXHIBIT A**

### **Additional Pre-Trial Guidelines for Division 35 Presiding Judge**

#### **A. EXPERT WITNESS DISCLOSURE:**

1. If a treating physician will be asked to testify as to the permanency of an injury, causation, or the cost of future treatment, the treating physician must be listed as an expert witness.
2. Parties are responsible for insuring that their experts are available for the entire trial docket, and to take appropriate steps to preserve testimony, if the expert will not be available for any portion of the docket. Except in emergencies, trial preservation depositions must be scheduled prior to the pretrial conference.

#### **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. **Please note that hearing time may be limited and hearings must be scheduled well in advance of the Pretrial Conference in order to ensure adequate time for Motions in Limine and other pretrial motions.**

#### **C. 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.

#### **D. 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.

#### **E. DEPOSITION DESIGNATIONS**

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

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

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.

## Example

45

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.