



The Honorable Juan R. Sánchez
United States District Court
Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
Independence Mall West
Philadelphia, Pennsylvania 19106-1797
Telephone: 267-299-7780
Facsimile: 267-299-5067

I. GENERAL INFORMATION

Judge Sánchez was born in Vega Baja, Puerto Rico and graduated from DeWitt Clinton High School in the Bronx, New York City. Judge Sánchez received his Bachelor of Arts degree, cum laude, from City College of the City University of New York, and his Juris Doctor from the University of Pennsylvania Law School, where he received the Benjamin R. Jones Award for his commitment to humanity and the law. After a career with Legal Aid and the Public Defender's Office of Chester County, Judge Sánchez was elected to the Chester County Court of Common Pleas in 1997, where he served until President George W. Bush nominated him to a seat on the Eastern District Court of Pennsylvania. Judge Sánchez was inducted July 9, 2004.

A. Communications with Judge Sánchez's Chambers

Judge Sánchez permits communications with chambers by telephone, regular mail or facsimile on scheduling and other non-substantive matters. All other issues must be addressed by a motion or other filing in the Office of the Clerk of Court. Judge Sánchez strongly encourages electronic filing.

Under no circumstances may any party or counsel communicate *ex parte* with any chambers personnel concerning substantive matters. Law clerks may not render advice to counsel; only Judge Sánchez grants continuances or any other relief. Telephone inquiries should be directed as appropriate to either of the following:

- Scheduling Deputy /Administrative Assistant: Nancy DeLisle
Telephone: 267-299-7780
Facsimile: 267-299-5067
Contact for matters related to civil scheduling and case management, requesting telephone conferences, and general procedures.
- ESR/Criminal Courtroom Deputy: Adrienne Mann
Telephone: 267-299-7789
Facsimile: 267-299-7788
Contact for matters related to criminal scheduling and case management, and

obtaining transcripts of civil and criminal proceedings.

All communications should be directed to Judge Sánchez's chambers in Philadelphia even if the case will be tried in Reading

B. Telephone Conferences

Judge Sánchez encourages telephone conferences to resolve issues in depositions or discovery. Counsel must certify that they have made a good faith effort to resolve the issue themselves. Counsel must exhaustively address all discovery disputes with opposing counsel before requesting Judge Sánchez's assistance. The requesting party or, in the event of a joint request, plaintiff's counsel must initiate all conference calls. Judge Sánchez is available daily from 8 to 9 a.m. and 5 to 6 p.m. for pre-arranged conference calls.

C. Stipulations/Consent Decrees

Any stipulations, consent decrees or other documents requiring Court approval/signature must be submitted in a form containing original signatures. Judge Sánchez will not sign any document containing a duplicated signature of any counsel/party/representative.

II. CIVIL PRE-TRIAL MATTERS

A. Requests for Extensions of Time

Where compelling circumstances so require, counsel may request an extension of a filing or other deadline only if such request has no effect on other existing deadlines, particularly trial dates, which will not be continued. Judge Sánchez will extend the deadline for filing dispositive motions or a trial pool date only in very limited circumstances and where genuinely necessary. If a request for an extension is unopposed, counsel must so state and may submit the request via letter or joint stipulation. Opposed requests must so state and be filed as a motion.

B. Discovery

1. Parties are expected to manage discovery in a case pursuant to Federal Rule of Civil Procedure 26 without involving Judge Sánchez, except in the rarest of cases. Judge Sánchez is available for scheduled telephone conferences between 8 a.m. and 9 a.m. and 5 p.m. and 6 p.m. daily when counsel can certify that they have made a good faith effort to resolve the discovery issue.

2. Judge Sánchez directs the exchange of expert reports and supporting documentation/information in advance of trial pursuant to Rule 26(a)(2)(B). A violation of

the disclosure requirements of the Rule may result in the barring of such testimony at trial.

3. Judge Sánchez relies on counsels' good faith compliance in all respects with Rule 26(f). The Rule 26(f) meeting shall take place as soon as possible and, in any event, at least fourteen (14) days before the Rule 16 scheduling conference. Outstanding motions will not excuse counsel from timely holding the meeting and submitting a Rule 26 plan. Compliance is mandatory. The meeting should not be viewed as perfunctory but rather as a meaningful and substantive discussion among professionals to formulate the discovery plan required by the Rule. Parties who do not comply will have no voice at the scheduling conference and may be subject to additional sanctions.

C. Rule 16 Scheduling Conferences

Once an answer is filed, Judge Sánchez orders a Rule 16 scheduling conference. Lead trial counsel must attend the Rule 16 conference and must enter her/his appearance prior to the conference unless Judge Sánchez approves a substitution. If lead trial counsel is appearing pro hac vice, local counsel must also attend the conference. All applications to appear pro hac vice must be in writing and must be approved prior to the conference.

Before the Rule 16 conference counsel will have discussed the nature and basis of the parties claims and defenses, the possibilities for a prompt settlement or resolution, and a discovery plan pursuant to Rule 26(f). Prior to the Rule 16 Conference the parties must submit a **joint** proposed Case Management Order to Judge Sánchez, who may adopt or modify the proposal. The joint proposed case management order shall include the date by which fact discovery shall be completed, the date by which expert reports will be exchanged and a date for submission of dispositive motions. Counsel should expect a final pre-trial conference to be scheduled approximately a month after the submission of any dispositive motion and a trial pool date approximately a week after the final pre-trial conference.

Any attorney appearing at the conference shall have evaluated the case for settlement purposes and have settlement authority from the client. Motions to dismiss, transfer, add parties and other threshold motions should be filed before the conference. **Counsel must be prepared to present argument at the conference on any pending motions.**

After the conference, Judge Sánchez will issue a Scheduling Order to govern further proceedings in the case.

D. Settlement Conferences

Judge Sánchez addresses the possibility of settlement at all stages in the proceedings. In addition, consistent with Local Rule of Civil Procedure 53.3, Judge Sánchez directs all parties to consider the use of an alternative dispute resolution process at an appropriate stage in the litigation. Judge Sánchez also encourages early referral to the Magistrate Judge for

settlement discussions.

Upon reaching a settlement, counsel must notify Judge Sánchez's chambers immediately and request dismissal of the action pursuant to Local Rule 41.1 or some other procedure that will effectively terminate the litigation.

E. Motions Practice

1. Judge Sánchez advises counsel to consider carefully Rule 11 and notifies counsel that he will impose sanctions when a filing has no factual basis.

2. Before any motion based on a curable defect under Rule 12 is filed, counsel must certify that opposing counsel has been given an opportunity to cure the defect.

3. Counsel is advised to file any dispositive motion 14 days after the close of discovery; opposing counsel will have 14 days to file an answer, if any. The latest date on which a dispositive motion may be filed is 10 days prior to scheduled pretrial conference. See Rule 56(c).

4. Judge Sánchez strongly encourages electronic filing; in the case of electronic filing, **no** courtesy copy is requested. Otherwise, counsel may **mail or fax** to chambers courtesy copies of *significant* motions, memoranda of law and other pleadings. Please only provide Judge Sánchez with one copy. Do not fax a copy and send via mail an original. Please do **not** copy Judge Sánchez on correspondence between counsel.

5. Any motion and its supporting memorandum of law shall not total more than 15 pages.

6. Judge Sánchez prefers motions for summary judgment follow Rule 56(c), with supporting affidavits, depositions, documents or other evidence, subject to the provisions of Rule 56(e) and (f). Where applicable, references to such evidence must include **specific** citations to exhibit, page, and line number. The party against whom the Motion for Summary Judgment is addressed shall file a Response not later than 14 days after the Motion for Summary Judgment is received. The Response, subject to provision of Rule 56(e) and (f), shall be supported with affidavits, depositions, documents or other evidence permitted by those provisions. Where applicable, references to such evidence must include **specific** citations to exhibit, page, and line number.

The movant may file a Reply not later than seven days after the Response is received. The Reply must **specify** the relevant exhibit, page, and line numbers when referring to the record.

A sur-reply may only be filed with permission of the Court upon good cause shown.

7. For all other motions, Judge Sánchez follows the requirements of Rule 7.1. Reply and sur-reply memoranda may only be filed with leave of Court for good cause shown. Counsel should file a motion requesting leave to file an additional memorandum and attach the proposed memorandum as an exhibit. The sur-reply may not exceed five pages.

F. Oral Argument

Unless oral argument is requested and may be useful, Judge Sánchez regularly decides motions on the papers.

For oral argument, Counsel should be prompt, professionally attired and well prepared. Do not merely repeat what your brief asserts. Oral argument should only be requested where there are unique factual/legal issues. A time limit of 10 minutes per side will apply and be strictly enforced.

G. Continuances

Continuances are not favored. Continuance requests must be sought as soon as possible. In civil cases, counsel must have good cause (e.g., death or serious bodily injury) for the request. Only written requests for continuances will be entertained. A formal motion is unnecessary. A request in the form of a letter is acceptable and may be faxed to the Judge Sánchez's Chambers at 267-299-5067. The party requesting the continuance must notify opposing counsel of the request at least 72 hours in advance of submitting the request to the Court.

The party requesting a continuance must present the position of opposing counsel. If opposing counsel opposes the request, the requesting party must set up a conference call with Judge Sánchez to resolve the matter.

III. CIVIL TRIALS

A. General Procedures

1. Civility is the foundation of Judge Sánchez's courtroom procedures. Rise when the judge and/or the jury enter and leave the courtroom.

2. Court normally begins at 9:00 a.m. The Court will make every effort to commence proceedings on time. Counsel, parties, and witnesses shall be on time.

3. Witnesses and parties should be instructed to wear proper attire to court. Shorts, tank tops, etc. are not permitted attire. Witnesses or parties not properly attired may be excluded from the courtroom.

4. Cellphones and pagers are not permitted in the courtroom. Attorneys are responsible for their own and their witnesses' cell phones and pagers. A violation of this rule may result in confiscation of the offending instrument.

5. Food, drink, chewing gum and the like are prohibited in the courtroom and witnesses should be so instructed.

B. Decorum of Counsel

1. Counsel shall dress in an appropriate professional manner. The trial shall at all times be conducted in a dignified and formal manner. Counsel shall not raise their voices any louder than is necessary to be clearly heard by the Court, witnesses, and the jury. Always address the Court and not one another. All remarks should be addressed to the Court and counsel will rise when addressing the Court. Counsel should never act or speak disrespectfully to the Court or opposing counsel in any manner.

2. Counsel's demeanor should be one of courtesy and professionalism. Counsel shall not exhibit familiarity with the parties, jurors, or opposing counsel. Avoid using first names. During opening statements or closing arguments, no juror should be addressed individually or by name. Neither counsel nor the parties by their body language or facial expression shall convey their reaction to the testimony of a witness.

3. Counsel must rise to address the court. Address the court as "Your Honor."

C. Final Pretrial Conferences

1. Judge Sánchez will utilize the pretrial conference to discuss specific trial procedures. Judge Sánchez regularly lists a pretrial conference date in the Scheduling Order. Generally, the final pre-trial conference will be held not less than 30 days after the close of discovery. Judge Sánchez will schedule conferences between 8:00 and 9:00 a.m. and between 5:00 and 6:00 p.m. or at other times consistent with his trial schedule. Pretrial conferences are typically scheduled for the week preceding the trial date or trial pool to which a case is assigned. Judge Sánchez utilizes the pretrial conference to resolve any outstanding motions and to discuss voir dire and other trial procedures.

2. Judge Sánchez's Scheduling Order will usually assign a case to a two-week trial pool. The list of matters to be tried is published in *The Legal Intelligencer*; however, that list is subject to modification. All parties, witnesses and counsel can expect their cases to be tried during the trial pool period and should arrange their schedules accordingly. Judge Sánchez will make every effort to give counsel reasonable notice of a trial date within the pool period and will attempt to notify counsel at least 72 hours before

the day trial is to commence, but in no event will counsel be given less than 24 hours notice. Counsel may telephone chambers on the first day of the trial pool for guidance. At the request of counsel, Judge Sánchez may list non-jury trials or complex matters for a special listing/date-certain. Counsel should contact chambers three to four days in advance of trial for courtroom assignment.

3. Motions *in limine* are encouraged with respect to legal matters that the parties reasonably expect to arise during trial. Motions *in limine* must be presented at the pre-trial conference; motions *in limine* filed after the final pre-trial conference will be considered only upon a showing of good cause.

4. Judge Sánchez expects to decide disputes regarding designations of depositions for presentation at trial and preserved objections within depositions prior to or during the final pre-trial conference.

D. Requested Voir Dire, Points for Charge and Verdict Slip

1. The parties will submit a **joint** neutral statement of the facts for voir dire. Prior to the final pre-trial conference the parties will submit **joint** questions for voir dire, highlighting only the disputed questions. Voir dire questions should not number more than 15.

2. The parties will also submit **joint** requested points for charge and a **joint** verdict slip with only the disputed points highlighted. Judge Sánchez prefers the Third Circuit Model Jury Instructions but will listen to argument on reasons for deviations. Requested points for charge and verdict slip shall be filed with the Clerk's office, **one point to a page in sequence**, and by e-mail (Chambers_of_Judge_Sanchez@paed.uscourts.gov) or diskette. Please provide Judge Sánchez's chambers with a hardcopy as well as a diskette. No other document should be e-mailed to Judge Sánchez and an e-mail to chambers does **not** constitute filing.

3. Judge Sánchez will hear argument on disputed points for charge and the verdict slip **only** at the final pre-trial conference and for a **total of 30 minutes** at the close of testimony and before closing argument.

4. Counsel will have an automatic exception for any point not given as submitted. All other exceptions must be made known to the Court before the jury is dismissed for deliberations.

E. Voir Dire

1. Usually, voir dire in civil cases will be conducted by counsel. If disputes arise, the Court will handle them, usually in chambers. Counsel shall have

submitted to Judge Sánchez and exchanged proposed voir dire questions prior to the trial date. No more than 15 questions will be asked.

2. The Court prefers that counsel not spend more than one hour on voir dire, including the striking procedure. If counsel take too long, Judge Sánchez may take over the process.

F. Court Seating

1. Under local practice, plaintiff's table is closest to the jury box.

2. If there is a request for more than one counsel table for all plaintiffs or all defendants, or any other special requests for seating, visual aids, etc. notify Judge Sánchez's Civil Courtroom Deputy, Nancy DeLisle, at least one week before trial.

3. Only counsel and parties, if desired, shall sit at counsel table. Witnesses shall sit in the spectator section only, unless otherwise authorized by the Court. If any party desires sequestration, that motion shall be made at the outset of the trial. If sequestration is ordered, all witnesses for all parties will be sequestered. Counsel will be responsible for informing their non-party witnesses that they should remain outside the courtroom until called, and that they should not discuss their testimony with other witnesses until the trial is concluded.

G. Exhibits

The Court requires single copies of sequentially numbered trial exhibits, irrespective of who propounds the exhibit. The parties need not agree on the admissibility of any exhibit in preparing the exhibit binder or binders. The Court will rule on the admissibility of individual exhibits in the course of trial.

Counsel should assemble all exhibits anticipated to be offered a trial and number those exhibits from 1 to 79 (or 790 as the case demands). Parties are advised to prepare a binder or binders for the Court's use as well as one for use with witnesses. As exhibits are offered at trial, counsel shall refer to the same exhibit by the same number; i.e.:

Direct: "Please look at the contract, Exhibit 32, and tell the jury . . .";

Cross: "Turning now to Exhibit 32, the contract, isn't it true that"

At the close of evidence the parties shall then assemble the admitted exhibits into a single binder or binders, as necessary, retaining the tab numbers used during trial to go out with the jury during deliberation. A binder of admitted exhibits hypothetically could be numbered 1-10, 14, 27, 33-39 and 45. The Court will hear argument on whether particular exhibits go out with the jury at the close of his charge to the jury.

Exhibits may be moved for admission at any time during counsel's case.

H. Witnesses

The rule of civility is absolute in addressing witnesses, whether on direct or cross examination. Do not approach a witness without leave of court. Do not ever, by facial expression, or other conduct, exhibit an opinion concerning any witness.

Counsel on direct must insure that a witness is speaking into the microphone for ease of recording and hearing.

If a witness was on the stand at a recess or adjournment, the witness should be on the stand ready to proceed when Court is resumed. Counsel are reminded that they may not discuss a witness's testimony with him or her once that witness has begun testifying until the witness is excused.

Judge Sánchez expects trial to proceed smoothly without delay; counsel is advised to avoid running out of witnesses during a trial day. If there is more than a brief delay, the Court may determine that counsel is resting. If there will be a problem with the scheduling of any witness, inform the Court at the preliminary conference and at the beginning of that day's proceedings.

Counsel shall provide opposing counsel and the court with a list of witnesses for next day.

I. Opening Statements

The purpose of the opening statement is to state briefly what counsel expects the evidence to show. Brief reference to the law will be permitted but only to the extent that it will aid the jury in understanding what counsel expects to prove. It is not proper to use the opening statement to argue the case. Upon violation of any of these rules, the Court may, sua sponte, interrupt the opening statement and admonish counsel. The Court may also impose time limits on opening and closing statements. Counsel must seek the permission of the Court to present an opening or closing statement in excess of thirty (30) minutes.

J. Objections to Questions

When objecting, counsel should only state "objection" and cite to the evidentiary rule upon which the objection is based in a word or two. Please see the Federal Rules of Evidence. Do not offer argument or explanation unless requested to do so by the Court. Counsel will not be permitted to state additional reasons after the Court has ruled. Do not use objections for the purpose of making a speech, recapitulating testimony, or attempting to guide the witness.

For the purposes of protecting the record, counsel may, outside of the hearing of the jury, request a more complete argument on an objection. Argument will be heard during a scheduled break or before or after trial for the day.

In a case involving multiple parties, an objection by one shall be considered an objection by all **unless** a party specifically opts out of the objection.

If a witness is testifying by way of videotape, counsel must resolve all issues of objections and redaction prior to or during the final pre-trial conference. In no case will trial be delayed to argue about or edit a videotape. See also III.M.2., regarding Other Courtroom Tools.

K. Examination of Witnesses

1. Counsel should ordinarily conduct examination of witnesses from the lectern or while seated at counsel table. If counsel is more comfortable standing, counsel shall stand behind the lectern. Do not approach a witness without specific permission. When permission is granted, please return to counsel table when the purpose of the permission is concluded.

2. When utilizing an exhibit during the examination of a witness, counsel should be prepared through tabbing or other means to display only the relevant document to the witness.

3. Counsel should ask witnesses state and spell their names for the Court Reporter's benefit.

4. If a witness is to be examined on the basis of prior written statements made by the witness, and these statements have not theretofore been received into evidence, the witness shall first be shown the statement and asked whether he or she acknowledges having made it.

5. Witnesses should be treated with fairness and consideration; they should not be shouted at, ridiculed, or abused in any manner.

6. Avoid the use of argumentative questions when questioning an opposing party. Keep your questions clear and to the point.

7. Do not step on the witness's answer with another question.

L. Cross Examination

If counsel wishes to cross-examine a witness on the basis of a deposition,

counsel must give a copy of the deposition to the witness, who will be permitted to read the deposition and to adopt or deny the testimony before counsel may proceed with cross-examination.

M. Other Courtroom Tools

1. Devices such as admissions, pleadings, requests for admissions, admissions of parties contained in depositions and interrogatories, etc., can be very useful to the presentation of a case. However, they are not part of evidence unless moved and admitted as such.

2. Any objection to any part of videotaped or written deposition testimony must be reviewed with the judge before trial and presented with a transcript and with reference to page numbers and grounds for objection. Trial counsel should be sure any videotape is rewound. See also Section III.J., regarding objections.

N. Side Bar Conferences

1. Judge Sánchez discourages side bar conferences; issues should be resolved at the final pre-trial conference.

2. Any matter arising during trial must be brought to the judge's attention between 8 a.m. and 9 a.m., during breaks, at lunch time or after the jury is dismissed for the day.

O. Closing and Charge

1. Judge Sánchez allows only 30 minutes for closing argument, including rebuttal, unless leave is granted for additional time. Plaintiff's counsel should be sure to reserve time from their closing to use for rebuttal. Failure to do so will constitute a waiver of rebuttal.

2. Any objection to any point for charge will be resolved or noted before closing arguments begin. No further changes will be made to the points for charge after closing arguments begin.

3. During closing, counsel shall refrain from expressing any opinion about the credibility of any witness, the culpability of the plaintiff or the defendant, personal knowledge of a fact in issue, or any fact not in evidence.

4. Judge Sánchez will not permit any personal attack or any closing argument which invokes gender or sexual orientation, ethnicity, race, religion or politics.

5. Any objection during closing should be carefully considered, brief and based on a rule in a word or two only.

P. Miscellaneous

1. The submission of Proposed Findings of Fact and Conclusions of Law in non-jury trials is required and must be submitted within three days of the conclusion of trial.

2. During jury deliberations, counsel shall be available, with their clients, to return to the courtroom on ten minutes' notice.

3. From the time the jury is selected until it is discharged, counsel, the parties, and their witnesses shall avoid all forms of contact with individual jurors. If the jury or any individual juror is entering an elevator, counsel is advised to take another elevator.

*For any civil litigation issues not addressed above, please consult the
Local Rules of Civil Procedure for the Eastern District of Pennsylvania,
available at*

<http://www.paed.uscourts.gov>

IV. CRIMINAL MATTERS

Judge Sánchez's requirements for courtroom decorum and civility apply particularly in criminal matters. Counsel is advised to treat the jurors' time and every witness with respect.

At no time during trial will Judge Sánchez permit counsel to comment adversely on the silence of a defendant, make statements of personal belief, attack counsel, appeal to the self-interest or passions of the jury, or make comments based on gender or sexual orientation, race, ethnicity, politics or religion. A violation of any of these rules will result in severe sanctions.

A. Motions Practice

All pretrial motions must be filed no later than thirty (30) days in advance of the scheduled trial date, and except in rare circumstances will be heard on a date at least 10 days prior to the scheduled trial date. Counsel are advised to provide Judge Sánchez with supporting memoranda no later than the date of the hearing.

B. Continuances of Trial

Any request for a continuance must be filed no later than fourteen (14) days in advance of the scheduled trial date. Requests for a continuance must be filed as a motion stating the reasons for the request. Any such motion must be accompanied by a proposed form of Order which, if approved by the Court, would grant the relief sought by the motion. The proposed form of Order **must** be consistent with the requirements of the Speedy Trial Act, 18 U.S.C. § 3161(h)(8) and include a proposed finding that explains in reasonable detail why the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial. Requests by letter are not permitted.

Judge Sánchez requires a telephone conference before granting the first continuance of a trial. Any subsequent continuance is strongly discouraged; counsel must appear in person to argue for a subsequent continuance.

C. Pretrial Conferences

Judge Sánchez will schedule a pretrial conference with counsel generally ten (10) days prior to the scheduled trial date and may be conducted by telephone in limited circumstances. Any issues related to voir dire, motions in limine, jury instructions and jury verdict forms must be submitted prior to that time.

Suppression hearings and hearings on motions *in limine* must be conducted on the record in a courtroom and started at least 10 days before trial. Complex questions should be

raised earlier so as not to delay the start of trial.

D. Voir Dire

Judge Sánchez conducts extensive voir dire in criminal jury matters. Counsel are permitted to address the venire with follow-up questions.

E. Testimonial Issues

Judge Sánchez strongly encourages the disclosure of Jencks Act and Fed. R. Crim. P. 26.2 statements **prior to** trial so that any dispute may be resolved at the pretrial conference without delaying the trial. If disclosure is withheld until after direct examination, the statements will be presumed to be relevant and the opposing party will be afforded a recess to prepare for cross-examination.

If the government expects to introduce F.R.E. 404(b) evidence relating to Other Crimes, Wrongs, or Acts, it must file a notice of its intention to do so prior to the pre-trial conference. The notice shall include a brief summary of the proposed evidence, identifying the elements of F.R.E. 404(b) which allows the evidence and a proposed jury instruction to precede the introduction of such evidence.

If tapes are used in a case, counsel will jointly resolve any dispute regarding the accuracy of transcripts prior to the pretrial conference. Any unresolved dispute must be raised at the pretrial conference.

F. Guilty Pleas

1. Before a defendant offers a guilty plea, the written colloquy must be completed and reviewed with the defendant.

2. The colloquy must state whether the plea agreement is a general plea of guilty, a conditional plea or a plea of *nolo contendere*. In addition, the colloquy must disclose to the defendant and the Court whether the plea is entered pursuant to Fed. R. Crim. P. 11(c)(1)(A), (B) or (C), relating to the obligation of the government regarding other charges under (A), a non-binding sentencing recommendation under (B) or a binding sentencing recommendation under (C). In addition, the colloquy **must** inform the defendant and remind the Court, pursuant to Rule 11(c)(3)(B), that the defendant has no right to withdraw the plea if the court does not follow the recommendation or request if the plea is entered under 11(c)(1)(B).

3. Form AO245B (Criminal Justice Work Sheet) must be completed for each defendant.

G. Sentencing

Judge Sánchez will schedule a speedy sentencing for a date selected at the time the Court accepts a guilty plea or there is a conviction at trial. Judge Sánchez discourages continuance of sentencing, and sentencing will be continued for good cause only. Judge Sánchez will not consider any request for a continuance exceeding ninety (90) days.

In the rare event of a ninety (90) day continuance, if both counsel for the Government and the defendant(s) believe that good cause exists for an additional continuance beyond the ninety-day period, counsel may jointly request in writing an additional continuance. Any such request must state why good cause exists for an additional continuance. If Judge Sánchez grants such a request, counsel shall be required to submit in writing a joint status update every thirty (30) days until judgment of sentence is entered.

Sentencing motions and supporting memoranda must be filed at least fourteen (14) days prior to the scheduled sentencing date, and any response thereto must be filed at least seven (7) days prior to the scheduled sentencing date.

Sentencing memoranda (exclusive of motions) must be filed no later than seven (7) days prior to the scheduled sentencing date, and any response thereto must be filed at least three (3) days prior to the scheduled sentencing date.

For any criminal litigation issues not addressed above, please consult the Local Rules of Criminal Procedure for the Eastern District of Pennsylvania, available at <http://www.paed.uscourts.gov>