

## **POLICIES AND PROCEDURES**

Honorable Joshua D. Wolson

United States District Court for the Eastern District of Pennsylvania

James A. Byrne United States Courthouse

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## I. GENERAL MATTERS

### A. Correspondence With Chambers

Counsel should direct communications concerning administrative or procedural matters to a Courtroom Deputy or Chambers. Letters (when appropriate) may be submitted to Judge Wolson via email, but such communications should be limited to routine matters for which no opposition is anticipated or required. Responsive letters should only be submitted at Judge Wolson's request.

### B. Conventions For Emails

Emails to Judge Wolson must include the case name and docket number in the subject line. Judge Wolson will filter emails based on certain terminology in the subject line. Therefore, to ensure that emails receive prompt attention, where appropriate, emails to Judge Wolson must also use the following verbiage in the subject line:

<b>Contents of email</b>	<b>Required verbiage</b>
Letters seeking extensions	"request for extension"
Letters seeking continuances	"request for continuance"
Proposed orders	"proposed order"
Stipulation	"stipulation"
Rule 26(f) reports	"26(f) report"
Letters seeking leave to exceed a page limit	"page limits"
Letters confirming that the parties have set aside dates for depositions	"deposition scheduling"
Letters updating Judge Wolson on the status of settlement discussions	"settlement status"

### **C. E-Filing Guidelines**

1. When submitting exhibits via ECF, Parties should submit each exhibit as a separate document on the CM/ECF system, rather than as a single file. If Judge Wolson receives a filing with a single document marked "Exhibits," he will strike the filing. In addition, when parties submit exhibits via ECF, they must give each document a name identifying the document. Thus, it is not sufficient to label a file "Exhibit A." Instead, the name should be "Contract," "Declaration of John Smith," or some other reference that permits Judge Wolson to identify what the exhibit is without having to open the file.

2. Parties should submit deposition testimony and other transcripts to Judge Wolson as full-sized pages, not miniscripts. In addition, parties submitting deposition transcripts should provide only a cover page identifying the witness and relevant pages from the transcripts. Parties should not submit the entire transcript unless the entire transcript is relevant to the issue. Judge Wolson will request the entire transcript if he deems it necessary.

3. Parties should not submit pleadings from the case before Judge Wolson. For example, there is no need to attach a copy of a complaint to a Motion to Dismiss. Judge Wolson can retrieve those documents from the CM/ECF system. Nor should parties submit pleadings from other federal cases. It is enough to cite the pleading by court, case number, and docket number. Judge Wolson will retrieve the pleading from the CM/ECF

system, if necessary. However, if parties rely on pleadings from state or foreign courts, they may submit the pleadings as exhibits because they might not be readily accessible.

4. All exhibits must be text searchable. To the extent that a document is scanned, as opposed to converted from Word or another format, the party submitting the document must use optical character recognition (OCR) or other comparable technology to ensure the exhibit's searchability.

#### **D. Sealed And Redacted Documents**

1. Except in emergency situations, a party may not file a document under seal (or redact necessary and/or substantive information) without first obtaining leave of court. A party seeking leave must file its motion of record with a courtesy copy of all documents that the party proposes to file under seal. In recognition of the common law right of public access, Judge Wolson will generally require the parties to file redacted versions of any sealed documents on the public record, unless the redactions would be so extensive as to render the document unreadable.

2. When filing a redacted document, a party must file an unredacted version that highlights any portion that the party proposes to redact.

3. Judge Wolson expects parties to work together when filing motions to seal. That is, if a party seeks to file under seal material that an opponent has marked "confidential," the parties must work together to prepare the required information (such

as affidavits or other material necessary to carry the burden of placing material under seal). If a party fails in this obligation, Judge Wolson will consider imposing the costs of additional proceedings (including responses or reconsideration motions necessary to supplement the record) on that party.

#### **E. Courtesy Copies**

Judge Wolson only requires courtesy copies in two circumstances: (1) for any filings made under seal; and (2) for any motions with more than five (5) exhibits. Parties should submit courtesy copies **electronically** via email to [WolsonCourtesyCopy@paed.uscourts.gov](mailto:WolsonCourtesyCopy@paed.uscourts.gov) and use the case caption, title of the filing, and ECF number in the subject line. Each submission should use the e-filed version that has the CM/ECF system's header at the top of the page. Each document must be a separate file, with a file name that is consistent with the descriptive name that the document has on the CM/ECF system. Parties may not submit courtesy copies via Dropbox, FTP, or some other source that requires Judge Wolson to download files to Judge Wolson's system. Instead, files should be emailed, even if that requires multiple emails. Parties also should not submit paper courtesy copies.

#### **F. Meeting And Confering**

Any time that lawyers must meet and confer, whether pursuant to a statute, a federal or local rule, these Policies and Procedures, or a Court order, the parties must have



a verbal conversation to satisfy the obligation. The conversation can be in person, by videoconference, or by phone. The mere exchange of written correspondence, whether letter, email, or otherwise, does not satisfy the obligation.

**G. Unpublished Decisions**

Parties should provide a Westlaw citation to all unpublished decisions unless there is no Westlaw citation available. Parties should not submit copies of unpublished decisions that are available on Westlaw or Lexis.

**H. *Pro Hac Vice* Motions**

Counsel seeking admission *pro hac vice* should use the form available on Judge Wolson's website.<sup>1</sup> Judge Wolson will deny *pro hac vice* motions for which no fee is submitted. Any lawyer admitted *pro hac vice* must register for the Court's CM/ECF system within seven days of the Order. If a lawyer fails to register, Judge Wolson will *sua sponte* cancel the *pro hac* admission. Judge Wolson will not mail orders to lawyers admitted *pro hac vice* who do not register for CM/ECF.

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<sup>1</sup> [https://www.paed.uscourts.gov/sites/paed/files/documents/forms/app\\_x.pdf](https://www.paed.uscourts.gov/sites/paed/files/documents/forms/app_x.pdf)

## **II. CIVIL CASES**

### **A. Pretrial Procedures**

#### **1. Affirmative defenses**

Parties are reminded that Fed. R. Civ. P. 11 only permits parties to assert affirmative defenses for which they have a good faith basis. Parties may not assert affirmative defenses prophylactically. If a party asserts affirmative defenses without a good faith basis, then Judge Wolson will strike the entire answer.

#### **2. Pretrial conferences**

Judge Wolson will schedule a preliminary pre-trial conference pursuant to Fed. R. Civ. P. 16 once each defendant has appeared in the case. Judge Wolson requires lead trial counsel to attend the conference in person. If lead trial counsel is unable to attend, then Judge Wolson will reschedule the conference. However, any request to reschedule must be made as early as possible and must be based on a pre-existing commitment.

Pending motions (such as a motion to dismiss) do not stay the parties' obligations to meet and confer pursuant to Fed. R. Civ. P. 26(f) or to attend a conference pursuant to Fed. R. Civ. P. 16. The parties should begin discovery as soon as the Rules permit, without waiting for the Rule 16 conference and regardless of whether a motion is pending. Judge Wolson will consider the time that was available and unused in determining an appropriate schedule for the case. If a party wishes to stay discovery during the pendency

of a motion, it should present its request in person at the Rule 16 conference. However, Judge Wolson will grant a stay of discovery only in extraordinary circumstances.

A joint status report pursuant to Fed. R. Civ. P. 26(f) is due at least seven (7) days prior to the Rule 16 conference and must be submitted to Judge Wolson via email. The parties must use Judge Wolson's sample Rule 26(f) form that will be attached to the order scheduling the Rule 16 conference. This form is also available on Judge Wolson's page on the Court's website.

Lead counsel shall participate in the Rule 26 conference, attend the Rule 16 conference, and be deemed lead counsel for all future proceedings. A designation of "lead counsel" will mean that counsel will attend all court proceedings and will deliver an opening statement and closing argument at trial, absent a written request from the client to have someone else perform those tasks.

### **3. Arbitration matters**

Judge Wolson will generally not conduct a pretrial conference for cases that are assigned to the Court's arbitration track. Judge Wolson expects the parties to complete all discovery prior to the date that the Clerk of Court assigns for the arbitration. Counsel may seek the assistance of Judge Wolson, if necessary, to complete discovery in advance of the scheduled arbitration date.

If a party seeks a trial *de novo* after an arbitration, Judge Wolson will schedule the trial as quickly as possible. Judge Wolson does not permit additional discovery after the arbitration.

#### **4. Stipulations and proposed Orders**

Contrary to Local Civil Rule 5.1.2(10), parties must email all stipulations and proposed orders to Chambers rather than send them to the Clerk of Court.

### **B. Motion Practice**

#### **1. Formatting requirements**

Except as set forth herein, motion practice will be conducted in accordance with Local Civil Rule 7.1. All written submissions to Judge Wolson must be double-spaced, in at least 12-point font with at least one-inch margins. A party may use any proportionally spaced font. All footnotes shall appear in the same font and font size as the body of the submission. Any briefs longer than ten (10) pages must include a table of contents. Counsel must file text-searchable versions of their briefs on the CM/ECF system.

The parties shall not include substantive arguments in footnotes. *Judge Wolson will not consider substantive arguments made in footnotes, nor will he deem those arguments preserved.*

In all written submissions to Judge Wolson, citations to documents on the docket, e.g., "Amended Complaint," should identify those documents by ECF number.

## **2. Replies and sur-replies**

Counsel should file replies and sur-replies only when necessary. Such briefs must be concise and address only new issues raised by opposing counsel. Judge Wolson discourages any replies or sur-replies that repeat or rehash previous arguments. Any replies or sur-replies must be filed as soon as practicable, but in any event, no later than seven (7) days after the previous filing.

## **3. Length of briefs**

Opening briefs in support of and in opposition to a motion shall not exceed twenty-five (25) pages, unless counsel includes a certification that the brief contains no more than 8,750 words. Replies shall not exceed ten (10) pages or 3,500 words, and sur-replies shall not exceed seven (7) pages or 2,450 words. Judge Wolson must receive any request to exceed an applicable page limit at least seven (7) days before the filing is due. Counsel may make such a request via letter emailed to Chambers with the words "page limits" in the subject line. Counsel making such a request should confer with opposing counsel and set forth opposing counsel's position in the letter.

## **4. Rule 12 motions**

Any Party that intends to file a motion under Federal Rule of Civil Procedure 12 must contact opposing counsel **at least one week before the due date** to discuss the substance of the contemplated motion and to provide an opportunity to cure any alleged

pleading deficiencies. Counsel must have a substantive verbal discussion, whether by phone or in person. Exchanges of letters or e-mails are not sufficient. If the Parties cannot reach agreement, then they must submit to Judge Wolson a letter, via email, that does not exceed five (5) single-spaced pages that sets forth each issue to be raised in the motion and each Party's substantive position with respect to that issue. The Parties must submit the letter to Judge Wolson by the deadline to respond to the Complaint. Judge Wolson will then attempt to resolve the dispute at a pre-motion conference, likely by phone or videoconference. If Judge Wolson cannot resolve the dispute at that conference, or if Judge Wolson determines that the conference will not facilitate resolution, then Judge Wolson will set a briefing schedule for the motion. This procedure does not apply in cases in which either party is proceeding *pro se*. In *pro se* cases, motions may be filed without pre-motion letters.

## **5. Summary judgment motions**

A summary judgment motion must be accompanied by (a) a single, consolidated statement of facts that the parties will prepare jointly and that will be separately filed on the docket and (b) a joint set of all exhibits cited in the statement of facts. Parties should prepare the statement of facts as follows:

- At least 28 days before the deadline to file a motion, the moving party must serve on all other parties (**but not file**) a statement of undisputed material

facts in a numbered, paragraph-by-paragraph recitation that contains specific citations to exhibits or testimony supporting each factual assertion;

- At least 14 days before the deadline to file a motion, any responding party must serve on all other parties (**but not file**) a response to the statement of facts that includes the following: (a) the responding party's response to each factual assertion, which shall be directly under the original paragraph and must include citation to any evidence that the responding party contends creates a material factual dispute and/or any argument for why the evidence that the moving party has cited does not support the factual assertion or is not admissible; and (b) any additional facts that the responding party intends to submit as part of the summary judgment briefing; and
- The moving party may then respond to any statements or arguments in the responding party's submission, directly under the relevant paragraph.

The result of this process will be a single, consolidated statement of facts that permits Judge Wolson to see each party's position on each factual assertion in one place. For example, for paragraph 1 in the statement of facts, Judge Wolson will see the movant's factual assertion and supporting evidence, followed by the respondent's response, followed by the movant's reply, before moving to paragraph 2. The moving party must file the consolidated statement of facts and the joint set of exhibits with its motion. The

joint set of exhibits must be filed in conformity with Section I.C.1 of these Policies And Procedures.

In the event that there will be cross-motions for summary judgment, each movant may file a separate statement of facts that follows the above procedure for each motion, but Judge Wolson requires the parties to prepare a single, consolidated set of exhibits.

If a party's motion for summary judgment, or an opposition thereto, is based in whole or in part on an argument that expert testimony is not admissible, then the party must raise such argument in a contemporaneous *Daubert* motion. That is, the party may not simply include arguments about expert inadmissibility within the summary judgment briefing. They must be the subject of a separate motion.

#### **6. Briefs from co-plaintiffs or co-defendants**

When multiple plaintiffs or defendants appear in a case, they must file joint motions with their co-parties unless there are clear conflicts in their position. The applicable page limits for individual parties shall apply for joint pleadings absent leave of Court.

#### **7. Incorporation by reference**

Parties may not incorporate by reference arguments from other briefs in the case, including briefs filed by other parties or briefs filed earlier in the case. If a party needs to repeat an argument that was made earlier in the case, then that party must include the



substance of the argument in the brief. If a party purports to incorporate an argument by reference, Judge Wolson will not consider the argument.

## **8. Reconsideration**

Parties should seek reconsideration sparingly. Parties shall not respond to a motion for reconsideration absent a Court Order. Any motion for reconsideration of a discovery order must itself comply with the page limits in Section II.C.1., below.

## **C. Discovery Matters**

### **1. Discovery disputes**

Judge Wolson urges the parties to settle discovery disputes among themselves. However, if the parties remain unable to resolve a dispute despite making a good faith effort, counsel for the aggrieved party shall file with Judge Wolson a motion in conformity with Local Civil Rule 26.1(b), with a form of order and short brief, not to exceed five (5) pages or 1,750 words (not including exhibits), describing the dispute. All discovery motions must attach the discovery requests at issue, as well as the written response. Judge Wolson will schedule a telephone conference with counsel to discuss the motion before the filing of any responsive brief.

In filing a discovery motion, the certificate of counsel must provide **specific** details of the parties' efforts to resolve the dispute informally. These efforts must include verbal communications, whether by phone or in person. Exchanges of letters or e-mails are not

sufficient. It is not sufficient to report that opposing counsel was not available or that the parties made "reasonable efforts." Judge Wolson will deny a discovery motion that does not meet these requirements.

In most cases, Judge Wolson expects to rule promptly on discovery motions and often decides such motions during the telephone conference. All motions must contain the certification required under Local Civil Rule 26.1(f).

Counsel should contact Judge Wolson by phone for any issues that arise during depositions. Counsel should not walk out of a deposition before trying to contact Judge Wolson and obtain guidance.

## **2. Privilege logs**

Parties preparing privilege logs must provide information sufficient for the opposing party to determine the basis for the assertion of privilege. For claims of privilege covering multiple e-mails, the party asserting privilege must describe the specific e-mails that are being withheld, as opposed only to the e-mail at the top of the e-mail string, and the basis for withholding each e-mail. Where several e-mails are exchanged between individuals, and the same privilege claim applies to all those e-mails, the party asserting privilege may describe the e-mails collectively, rather than one-by-one.

#### **D. Extensions**

Judge Wolson is reluctant to grant continuances of trial dates and other scheduled court events and will only do so in extreme circumstances. Judge Wolson will consider other requests for extensions on an appropriate showing of good cause. Requests for continuances or extensions may be made by letter, which can be emailed to Chambers. Any request for a continuance or extension must include the words "request for continuance" or "request for extension," as appropriate, in the subject line of the email. Judge Wolson expects counsel for the party requesting an extension to confer with opposing counsel and state opposing counsel's position in the letter. **Any request for an extension or continuance must be made at least seven (7) days before the applicable deadline or include a showing of good cause as to why the Party making the request could not comply with that requirement.**

#### **E. Protective Orders And Confidentiality Agreements**

Any request for a protective order or approval of a confidentiality agreement must be made by motion. Judge Wolson will not accept stipulated proposed orders in lieu of a motion. All such motions must satisfy the requirements of *In re Avandia Mktg., Sales Practices & Prod. Liab. Litig.*, 924 F.3d 662 (3d Cir. 2019) and *Pansy v. Borough of Stroudsberg*, 23 F.3d 772 (3d Cir. 1994).

**F. Pretrial Memoranda**

When Parties submit pretrial memoranda, they must include all matters set forth in Local Rule of Civil Procedure 16.1(c), as well as the party's position on whether Judge Wolson should impose time limits on each side's trial presentation and, if Judge Wolson does impose a time limit, what that limit should be.

**G. Bench Trials**

In civil bench trials, each Party shall file on the docket at least seven (7) days in advance of trial a copy of an affidavit constituting the direct testimony of each expert witness that the party will call as part of its case in chief.

**H. Settlement Agreements**

Judge Wolson will not retain jurisdiction to enforce confidential settlement agreements. If Parties want Judge Wolson to retain jurisdiction to enforce a settlement, they must place the agreement on the docket or include all material terms in a stipulation of dismissal.

### III. CRIMINAL CASES

#### A. Motions

All pre-trial motions must be filed no later than thirty-five (35) days in advance of the trial date and, except in rare circumstances, will be heard on a date prior to the scheduled trial date. Responses must be filed twenty-one (21) days in advance of the trial date.

All written submissions to Judge Wolson must be double-spaced, in at least 12-point font with at least one-inch margins. A party may use any proportionally spaced font. All footnotes shall appear in the same font and font size as the body of the submission. Any briefs longer than ten (10) pages must include a table of contents. Counsel are encouraged to post searchable versions of their briefs to the CM/ECF system.

The parties shall not include substantive arguments in footnotes. *Judge Wolson will not consider substantive arguments made in footnotes, nor will it deem those arguments preserved.*

In all written submissions to Judge Wolson, citations to documents on the docket, e.g., "Indictment," should identify those documents by ECF number.

#### B. Trial Continuances

Any request for a continuance must be filed no later than fourteen (14) days in advance of the scheduled trial date or show good cause why the request was not made

in that time. 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 order consistent with the requirements of the Speedy Trial Act, 18 U.S.C. § 3161. The order shall 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. Any motion for a continuance of a trial date must be accompanied with a speedy trial waiver. The speedy trial waiver form can be found as an attachment to the first trial listing. For a Government continuance request, where the defendant will not sign a waiver, Judge Wolson will hold a hearing. Judge Wolson does not permit continuance requests by letter.

### **C. Pre-Trial Hearings**

Judge Wolson typically holds suppression, *Starks*, and *Daubert* hearings at least fourteen (14) days prior to trial. Following a hearing on a motion to suppress, Judge Wolson might request the submission of post-hearing briefs or proposed findings of fact and conclusions of law. Judge Wolson will establish a schedule of these submissions after the suppression hearing.

**D. Pre-Trial Conferences**

Pre-trial conferences with counsel will occur at least three (3) days prior to trial. Any issues relating to *voir dire*, motions *in limine*, jury instructions, and jury verdict forms will be addressed at that time.

**E. Trial Memoranda**

At least seven (7) days prior to the trial date, the Government must file a pre-trial memorandum setting forth the essential elements of the offense(s), the facts that it intends to present, the identity of each witness it intends to call, a statement of the substance of each witness's testimony, and any legal issues. The defendant is not required to file a pre-trial memorandum but may do so on the same schedule as the Government.

**F. Guilty Plea Memoranda**

The Government must submit a guilty plea memorandum at least three (3) days prior to the change of plea hearing. The memorandum shall include the elements of each offense to which the defendant is pleading guilty and legal citations for the elements, the maximum and any applicable minimum statutory penalties for each offense, the terms of any plea agreement, and the factual basis for the plea.

**G. Sentencing**

Sentencing motions and supporting memoranda must be filed at least seven (7) days prior to the scheduled sentencing date. Responses to any sentencing motions must

be filed at least three (3) days prior to the scheduled sentencing date. Motions filed pursuant to U.S.S.G. § 5K1.1 shall be filed no later than seven (7) days prior to sentencing. Sentencing memoranda (exclusive of motions) must be filed no later than seven (7) days prior to the scheduled sentencing date, and any response(s) thereto must be filed at least three (3) days prior to the scheduled sentencing date.

Judge Wolson will set a sentencing date at the time Judge Wolson accepts a guilty plea or there is a conviction at trial. Judge Wolson discourages requests for continuances of sentencing and will continue a sentencing for good cause only. Judge Wolson will not consider any request for a continuance exceeding ninety (90) days.

In the rare event of a ninety-day continuance, if counsel for both the Government and the defendant(s) believe that good cause exists for an additional continuance beyond the initial ninety-day period, then counsel may jointly request in writing an additional continuance. Any such request must state why good cause exists. If Judge Wolson grants such a request, counsel shall be required to submit in writing a joint status update every forty-five (45) days until judgment of sentence is entered.

If a defendant is responsible for restitution, then the Government must submit information in its sentencing memorandum to enable Judge Wolson to determine entitlement, the name and the address of each victim, the amount of loss for each victim, and documentary support for each amount. If liability for restitution is joint and several,



then the Government shall itemize the restitution amount for which each defendant is responsible.

#### **IV. HABEAS MATTERS**

In all *habeas corpus* matters, Judge Wolson will **not** pre-screen prisoner submissions to determine if it requires a response. Instead, Judge Wolson expects the relevant Government agency (whether a County, the Commonwealth, the United States, or otherwise) to respond to motions or objections within 14 days, absent a Court-ordered extension. In cases in which Judge Wolson is considering a Report and Recommendation, the Government agency may respond by saying that it stands by its prior briefing and/or the Report and Recommendation. Judge Wolson reserves the right to treat a failure to respond as a statement that the motion or objection is uncontested.

## **V. COURTROOM AND TRIAL PROCEDURES**

### **A. Motions *In Limine***

Absent leave of court, a party shall not file more than five (5) motions *in limine*.

### **B. Courtroom Technology**

Judge Wolson holds proceedings in Courtroom 12-B, which is generally equipped for electronic presentation of evidence. Parties expecting to employ courtroom technology are encouraged to contact the Courtroom Deputy reasonably in advance of trial and to conduct a trial run to minimize disruptions during the trial itself.

### **C. Jury Selection**

Judge Wolson conducts *voir dire*. Judge Wolson generally calls all prospective jurors to sidebar or into the jury room for individual *voir dire* after asking general questions that elicit non-verbal responses. Counsel should expect to make challenges for cause at the conclusion of each potential juror's individual *voir dire* session.

### **D. Proposed Jury Instructions And Verdict Forms**

Judge Wolson will generally require the parties to submit a joint proposed set of jury instructions. Judge Wolson's pretrial order will detail how the parties should present contested jury instructions. Each point for charge and proposed jury interrogatory shall be numbered and on a separate sheet of paper. Each proposed instruction must be submitted with corresponding legal authority. If a model jury instruction is used, then the

party submitting it shall state whether the proposed instruction is unchanged or modified.

If a party modifies a model instruction, then additions and deletions must be noted.

**E. Note Taking By Jurors**

Judge Wolson generally permits jurors to take notes.

**F. Courtroom Protocol**

During oral argument outside the presence of a jury, counsel can address Judge Wolson from counsel table or the podium, at counsel's discretion. When examining a witness or addressing a jury, counsel should speak from the podium. Counsel may approach the witness without asking permission. Counsel shall direct all comments and questions to Judge Wolson or the witness, not to opposing counsel or the jury.

Judge Wolson does not permit speaking objections. If counsel needs to be heard on a matter immediately, request a sidebar. Judge Wolson generally prefers to avoid sidebars, however. Therefore, Judge Wolson encourages counsel to raise evidentiary issues at the final pretrial conference or outside the presence of the jury, whenever possible.

Absent leave of Court, only one attorney for each side may examine the same witness or address the jury during the opening statement or summation.

## **G. Jury Deliberations**

Judge Wolson will generally provide the jury with multiple, written copies of the jury instructions. After the jury has been instructed and taken to the jury room, Judge Wolson and counsel will confirm the admitted exhibits to be presented to the jury for its consideration during deliberations if the jury requests. Counsel who seek to depart the courthouse during jury deliberations must first seek leave of Court.

## **H. Development Of Young Lawyers**

Judge Wolson encourages trial counsel to assign court presentations to less-experienced attorneys, particularly where the less-experienced attorney is more familiar with the matter at hand (*e.g.*, discovery hearings). If necessary, Judge Wolson will permit two lawyers to make an argument to ensure that a more experienced counsel has an opportunity to buttress a younger lawyer's presentation, if the request is made in advance. Judge Wolson will draw no inference from a party's decision to have a younger lawyer make a particular presentation, including as to whether the client deems the issue "important."