# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JUDICIAL PREFERENCES Rev. 05/02/24

<b>District Judges</b>	Preferences
Arleo, Hon. Madeline Cox	Courtesy Copy: Courtesy copies are no longer required, unless a motion is: (1) filed under seal; or (2) supported by exhibits exceeding 50 pages. Only in those instances shall the parties file one unredacted paper copy of any proposed orders, motion papers, briefs, and accompanying exhibits by regular mail to chambers, clearly marked "Courtesy Copy." Paper submissions should be single-sided and should not be bound by plastic or velo-binding. Courtesy copies of letter correspondence are not permitted; all letter correspondence must be electronically filed via CM/ECF.
	All correspondence and proposed orders must be submitted via ECF.
	<b>Jury Charges</b> : Counsel shall provide a copy of proposed jury charges to Chambers in Microsoft Word format via email or thumb drive one week before trial.
	<b>Faxes</b> : Parties must contact Chambers for approval before faxing any documents. There is a <b>three</b> (3) page limit for all faxes unless otherwise approved by Chambers.
Bumb, Hon. Renée Marie	Refer to the document: <a href="https://www.njd.uscourts.gov/sites/njd/files/ProceduresJudgeReneeMarieBumb.pdf">https://www.njd.uscourts.gov/sites/njd/files/ProceduresJudgeReneeMarieBumb.pdf</a> for guidance on matters before the Hon. Renée Marie Bumb
Castner, Hon. Georgette	Courtesy Copies: Counsel shall not provide courtesy copies to Chambers unless requested.
	<b>Pro se Filings:</b> Parties appearing <i>pro se</i> must file all documents, applications, and motions directly with the Clerk's Office. Documents mailed to the courthouse must be addressed to the Clerk's Office and <b>NOT</b> to Judge Castner.
	Pleadings/Correspondence: All pleadings and correspondence to the Court (with the exception of confidential settlement position letters) must be electronically filed.
	<b>Extensions of Time on Consent</b> : All requests for extensions shall be filed via ECF. Any requests for extensions or adjournments shall indicate whether all parties consent.
	<b>Motion Day:</b> Unless otherwise notified by the Court via CM/ECF, Judge Castner decides all motions on the papers and no appearances are required on the motion day.
	Written Submissions to the Court. Except on emergency matters, all communications with Chambers shall be in writing via CM/ECF.

Cecchi, Hon. Claire C.	<b>All Submissions</b> , including correspondence and proposed orders, must be electronically filed via CM/ECF.
	All Requests should be accompanied by a proposed order.
	All Briefs and Proposed Orders must be filed in searchable PDF format. All other documents, such as exhibits, may be filed in non-searchable PDF format.
	One Courtesy Copy: Courtesy copies are no longer required, unless a motion is: (1) filed under seal; or (2) supported by exhibits exceeding 50 pages. Only in those instances shall the parties file one unredacted paper copy of any proposed orders, motion papers, briefs, and accompanying exhibits by regular mail to chambers, clearly marked "Courtesy Copy."
	<b>Jury Charges</b> : Counsel shall provide a copy of proposed jury charges to Chambers in Microsoft Word format via email or thumb drive one week before trial.
	Faxes: Parties must contact Chambers for approval before faxing any documents. There is a three (3) page limit for all faxes unless otherwise approved by Chambers.
Chesler, Hon. Stanley R.	Courtesy Copies. Counsel shall <u>not</u> provide courtesy copies to Chambers unless requested.
Hayden,	MAGISTRATE JUDGE ASSIGNMENT:
Hon. Katharine S.	In Newark, cases are randomly assigned among the Magistrate Judges.
	STANDING ORDERS:
	None.
	PROCEDURE TO ADMIT COUNSEL PRO HAC VICE
	Motions are referred to the Magistrate Judge for disposition.
	MOTION PRACTICES
	<i>Motions</i> : Oral argument will not automatically be held on the listed return date. If the Judge grants the request for oral argument, or wishes to hear oral argument on a matter where no request has been made, a text order setting forth the date and time for the argument will be entered via CM/ECF.
	Briefs: On summary judgment motions, in addition to requiring strict compliance with L. Civ. R. 56.1 (separate statements of fact), Judge Hayden requires that briefs contain a narrative statement of facts specific to the issues raised in the motion. Formal briefs must contain a Table of Contents and a Table of Authorities. Judge Hayden requires strict compliance with the length limitations and format requirements for briefs set forth in L. Civ. R. 7.2 (and any amendments and modifications thereto). Judge Hayden enforces the provision in L. Civ. R. 7.2(b) that mandates that a litigant get special permission before submitting papers that are not in compliance. Judge Hayden generally disapproves of the use of footnotes in briefs. See In re Opinion 662 of the Advisory Committee on Judicial Conduct, 133 N.J. 22, 32 (1993) (Clifford, J., concurring). Where parties rely on deposition transcripts, they should be prepared to supply a complete copy of the deposition upon request.

Notice of Abandoned Issues: Judge Hayden requests that counsel promptly notify the Court

	and their adversaries of any issue abandoned while a matter is under consideration.
	Sur-replies: Pursuant to L. Civ. R. 7.1(d)(6), no sur-replies are permitted without leave of the Court. Any request to file a sur-reply must be accompanied by an exhibit consisting of the proposed sur-reply. If the proposed sur-reply is not included as an exhibit, the request will be summarily denied. The Court generally rules on a motion to file a sur-reply when deciding the underlying motion.
	Motions to Seal: In civil cases, motions to seal concerning pre-trial matters are referred to the Magistrate Judge.
	Adjournments/Extensions: All requests for adjournments or extensions must be made in writing and, in the normal course, should be filed via CM/ECF.
	COMMUNICATIONS WITH THE COURT:
	Judge Hayden does not accept submissions or correspondence by fax.
	COPIES OF PAPERS:
	Two courtesy copies of proposed orders, motion papers, briefs, and exhibits must be sent by regular mail to Chambers. Please do not send courtesy copies of letter correspondence.
Hillman, Hon. Noel L.	One Courtesy Copy: Motion papers, briefs, letter memoranda, and proposed orders marked "Courtesy Copy" sent by regular mail to chambers.
	<b>All Pretrial Submissions</b> such as voir dire, jury instructions and verdict sheet on disk in Word format.
	<b>Correspondence</b> : Under no circumstances should correspondence, proposed Orders or any other filings of any kind be submitted by email without express consent of Chambers.
Kiel, Hon. Edward	Rules and Preferences
S.	Order Concerning Citizenship of Unincorporated Business Organization
Kirsch, Hon. Robert	Judge Robert Kirsch Judicial Preferences
Kugler, Hon. Robert B.	Instructions to Attorneys
	<b>Courtesy Copies</b> : Motion papers as required in the Court's Policy & Procedures mailed to chambers marked "Courtesy Copy".

# Martini, Hon. William J.

All Submissions: Including correspondence, must be electronically filed via CM/ECF.

All Requests: Should be accompanied by a proposed order.

**All Briefs and Proposed Orders**: Must be filed in searchable PDF format. All other documents, such as exhibits, may be filed in non-searchable PDF format.

**One Courtesy Copy**: Proposed orders, motion papers, briefs, and accompanying exhibits must be sent by regular mail to chambers. Courtesy copies should be marked "Courtesy Copy." Please do not send courtesy copies of letter correspondence.

No Submissions will be accepted via fax or email without the express consent of chambers.

# Martinotti, Hon. Brian R.

# Final Pretrial Order Form

**All Submissions:** All submissions, including pleadings and correspondence, must be electronically filed via CM/ECF. Filings and submissions will not be accepted via fax or e-mail except as provided herein.

No Courtesy Copies.

**Pro se Filings:** All filings by pro se litigants shall be mailed to or filed directly with the Clerk's Office. Documents mailed to the courthouse must be addressed to the Clerk's Office, NOT Judge Martinotti.

**CM/ECF Filings:** Pleadings, motions, and letters must be filed in searchable PDF format. Supporting documents, such as exhibits, may be filed in non-searchable PDF format.

**Proposed Orders:** If any relief is being sought, the CM/ECF filing must be accompanied by a proposed order in searchable PDF format.

**Pre-motion conference:** In an effort to resolve cases expeditiously, before bringing a motion to dismiss, motion for a more definite statement, motion to remand, motion for change of venue, or motion for judgment on the pleadings, a party must submit a letter, not to exceed three (3) single-spaced pages, requesting a pre-motion conference. The letter must set forth the basis for the anticipated motion and include citations to relevant authority. Within seven (7) days after receipt of this letter, all adversaries must submit a written response, not to exceed three (3) single-spaced pages. No party may submit a reply letter unless directed by the Court.

Failure to file a pre-motion letter may result in the motion being administratively terminated without notice.

Affidavits and exhibits are not permitted unless directed by the Court. A proffer by the attorney of the contents of any such affidavit(s) and/or exhibit(s) shall suffice.

The Court will attempt to resolve the dispute(s) at a pre-motion conference (in person or via telephone/videoconference), to the extent possible. If the dispute cannot be resolved at the pre-motion conference (or if the Court determines that a conference would not be helpful), the moving party may proceed with filing its motion.

To be clear, this procedure does not preclude a party from filing any of the above motions pursuant to Local Civil Rule 12.1. Rather, the Court hopes to use this procedure to advance the case efficiently and minimize the costs of litigation to the parties. In addition, compliance with this procedure shall not be deemed a waiver of any parties' defenses as to lack of personal jurisdiction, improper venue, insufficient process, or insufficient service of process.

A party's submission of a pre-motion letter will toll that party's time to file its motion (or answer) through (i) the date of the pre-motion conference or (ii) the Court's decision not to conduct such a conference. If the Court determines that a pre-motion conference would not be helpful and instructs a party to proceed with filing its proposed motion without a conference, that party shall have an additional seven (7) days to file after its Fed. R. Civ. P. 12(a) deadline, unless additional time is stipulated or the Court so orders.

This letter exchange does not apply in cases in which either side is pro se or in bankruptcy or social security appeals.

**Pretrial Submissions (Jury Trials Only):** Fourteen days prior to a scheduled jury trial, parties shall meet and confer and submit to the Court joint proposed: (1) neutral statement; (2) voir dire; (3) witness list for voir dire; (4) preliminary jury charge; (5) final jury charge; (6) anticipated jury instructions; (7) verdict sheet; and (8) exhibit list. If there are any areas of disagreement, each party shall submit their version of the proposed language for the Court's review.

Confidential Information: Any letter containing confidential or sensitive information may be emailed to chambers at njdnef\_martinotti@njd.uscourts.gov. Any documents filed under seal shall comply with Local Civil Rule 5.1.

Communications With Chambers: Calls to chambers are permitted only in urgent situations that require immediate attention. All other communication with chambers shall be electronically filed via CM/ECF. Parties appearing *pro se* must file all documents, applications, and motions directly with the Clerk's Office. E-mails to chambers at njdnef\_martinotti@njd.uscourts.gov will be accepted in lieu of phone calls. E-mails may not contain substantive content regarding a case. Any substantive content received via e-mail without consent of chambers will be ignored.

**Extensions of Time:** If consented, may be done by consent order via CM/ECF. If not consented, follow the regular motion procedure. To adjourn a previously scheduled appearance, obtain consent from your adversary and provide chambers with new dates in writing via CM/ECF, or contact the courtroom deputy via email.

Appearances (including in-person, Zoom, or telephonic): Notice of any scheduled appearance, including but not limited to status conferences, settlement conferences, and oral arguments, will be posted on the docket. Where counsel is scheduled to appear, all clients or representatives with settlement authority must be available by phone unless otherwise directed by chambers. The Court expects counsel to appear at least 15 minutes prior to any appearance.

**Scheduling and Adjournments:** Contact Lissette Rodriguez via email (<u>Lissette\_Rodriguez@njd.uscourts.gov</u>).

## Press Protocol:

1. Compliance with the Judge, U.S. Marshals Service, Court Security Officers, and Court Staff is required at all times. They are charged with enforcing the Court Rules and ensuring Court Security, and any instruction from them supersedes the following rules.

2. Photography, use of audio or video recording devices, and use of broadcasting or televising devices are prohibited in the courtroom and areas immediately adjacent thereto.
3. Electronic devices having a primary function of wireless communication, including but not limited to cell phones, laptops, and tablets, are permitted in the courtroom but must be rendered inoperable. They need not be turned off, but they must be silenced and may not be used to transmit or broadcast audio or visual feeds, updates, or messages in any form. They may be used for the purpose of note-taking only.
4. Members of the press shall have their credentials visible at all times and, if necessary upon request, shall present them to Court staff for documentation.
5. Any persons in violation of these rules will have their devices confiscated and risk being removed from the courtroom or courthouse at the discretion of the Judge, U.S. Marshals Service of Court Security Officers.
6. If you would like more information, the rules governing media coverage and possession and use of electronic equipment can be found under Local Civil Rules 401.1 and 501.1, available on the Court's website. Any other specific requests or inquiries can be emailed directly to chambers at njdnef_martinotti@njd.uscourts.gov
All submissions, including correspondence, must be electronically filed via CM/ECF. Do not send courtesy copies of motion papers unless requested to do so.
<b>Proposed Jury Charges</b> : An additional copy, in Microsoft Word or WordPerfect format, should be emailed to <a href="mailto:njdnef_mcnulty@njd.uscourts.gov">njd.uscourts.gov</a> . Email subject line and file name in this format: 12- 3456 Smith v Jones Proposed Jury charge.
Refer to the document <u>Judicial Preferences and Procedures</u> for guidance on matters before the Honorable Julien Xavier Neals, U.S.D.J.
Diversity Jurisdiction Certification Form
Final Pretrial Order Template

O'Hearn, Hon. Christine P. **Courtesy Copies**: If electronically filed documents exceed twenty-five (25) pages, two courtesy copies of the electronically filed/ECF stamped submission shall be mailed to Chambers within seven (7) days the papers are filed on ECF. All exhibits shall be clearly labeled, tabbed and bound. Paperclips, binder clips and rubber bands will not be accepted.

**Electronic Submissions**: All parties, with the exception of *pro se* parties, shall file all documents, in both civil and criminal matters, via ECF. All papers electronically submitted shall, to the extent possible, be submitted in a text-searchable PDF format.

**Emails**: Parties must contact Chambers for approval before emailing any documents or submissions in civil cases.

**Extensions of Time on Consent**: All requests for extensions shall be filed via ECF and be accompanied by a proposed order. Any requests for extensions or adjournments shall indicate whether all parties consent.

Adjournments Requests for Hearings/Conferences: Communications regarding scheduling and adjournments are handled by the Deputy Clerk, Haley Minix. If an adjournment is being sought, counsel shall first attempt to obtain consent from all parties and provide the Court with new dates upon which all parties are available. Absent exigent circumstances, adjournment requests made less than two days prior will not be granted.

Communications with the Court: Please do not contact Chambers with legal or procedural questions that are covered by the Local Rules of this Court or the Federal Rules of Civil Procedure. Communications with law clerks are limited to Chambers' procedural matters only and not as to any substantive matters.

**Oral Argument**: If the Court grants a request for oral argument or wishes to hear argument when no request has been made, the parties will be notified via ECF. The Court is more likely to grant oral argument if a party represents, at the time of the filing of the request for argument, that a junior attorney (i.e. less than five years' experience) will present the argument. A supervising attorney may attend to assist only if necessary.

Padin, Hon. Evelyn

#### Civil Preferences

District Judge Evelyn Padin Preferences

District Judge Evelyn Padin Proposed Final Pretrial Order

Parties should note the recent updates to Judge Padin's Preferences regarding pre-motion letters (I.E.) and Generative Artificial Intelligence (I.B.).

## **Criminal Preferences**

All plea-related documents shall be submitted to Chambers at least one week prior to the plea date.

# Clerkship and Internship Applications

Unless otherwise noted, all applications will be accepted on a rolling basis. Applications should be emailed to <u>Chambers of Judge Evelyn Padin@njd.uscourts.gov</u> and include, in one PDF titled Last Name\_First Name\_Term: (1) cover letter; (2) resume; (3) writing sample; (4) at least two recommendations. Recommendations may be emailed under separate cover. **Please do not** 

# mail applications.

## **Clerkships**

Clerks are hired approximately one year ahead of the clerkship term. For future graduates, applications are accepted on the same timeline as the <u>OSCAR hiring plan</u>. However, Judge Padin has a strong preference for candidates with at least some post-graduate (preferably litigation) experience.

## **Internships**

Interns are hired approximately six months in advance.

# **Courtesy Copies**

Two courtesy copies of motions should be sent to chambers. If submissions are particularly voluminous, i.e., requiring more than one binder, the parties should submit courtesy copies of the briefs and certifications/affidavits only, with any additional exhibits submitted on a USB drive.

Quraishi, Hon. Zahid N.

Pre-Motion Conference (<u>starting 05/01/2022</u>): In an effort to resolve cases expeditiously, before bringing a motion to dismiss, motion for a more definite statement, motion to remand, motion for change of venue, and motion for judgment on the pleadings, a party must submit a letter, not to exceed three (3) single-spaced pages, requesting a pre-motion conference. The letter must set forth the basis for the anticipated motion and include citations to relevant authority. Within seven (7) days after receipt of this letter, all adversaries must submit a written response, not to exceed three (3) single-spaced pages. No party may submit a reply letter. Generally, affidavits and exhibits are not permitted. A proffer by the attorney, however, of the contents of any such affidavit(s) and/or exhibit(s) shall suffice.

The Court will attempt to resolve the dispute(s) at a pre-motion conference (in person or via videoconference or telephone), to the extent possible. If the dispute cannot be resolved at the conference (or the Court determines that a conference would not be helpful), the moving party will file its motion. To be clear, this procedure does not preclude a party from filing one of the above motions pursuant to Local Civil Rule 12.1. Rather, the Court hopes to use this procedure to advance the case efficiently and minimize the costs of litigation to the parties. In addition, compliance with this procedure shall not be deemed a waiver of any parties' defenses as to insufficient service of process or lack of personal jurisdiction.

A party's submission of a pre-motion letter will toll that party's time to file its motion (or answer) through (i) the date of the pre-motion conference or (ii) the Court's decision not to conduct such a conference. If the Court permits a party to file its proposed motion without a conference, that party shall have an additional 7 days to file after its Fed. R. Civ. P. 12(a) deadline, unless additional time is stipulated.

This letter exchange does not apply to bankruptcy appeals, social security appeals, cases seeking transfers based on Multidistrict Litigation (MDL) orders, or cases in which either side is appearing *pro se*.

All Submissions: All pleadings and correspondence to the Court (with the exception of confidential settlement position letters) must be electronically filed. Filings and submissions will not be accepted via fax or e-mail without leave of the Court.

**Pro se Filings:** All filings by *pro se* litigants shall be mailed to or filed directly with the Clerk's Office. Documents mailed to the courthouse must be addressed to the Clerk's Office, NOT Judge Ouraishi.

**CM/ECF Filings**: Pleadings, motions, letters, and proposed jury charges must be filed in searchable PDF format. Supporting documents, such as exhibits, may be filed in non-searchable PDF format.

**Proposed Orders:** If any relief is being sought, the CM/ECF filing must be accompanied by a proposed order in searchable PDF format.

**Motions for Summary Judgment**: Parties may not file an early motion for summary judgment (*i.e.*, prior to the close of fact discovery) without leave from either Judge Quraishi or the Magistrate Judge assigned to the case. When seeking leave from Judge Quraishi, the moving party must first submit a letter, no longer than three pages, summarizing the party's substantive argument. Within one week of the moving party's letter, the party opposing the motion must also submit a letter, no longer than three pages, summarizing the party's substantive argument in opposition.

**Courtesy Copies:** By request of the Court only.

How to Communicate with Chambers: Parties appearing *pro se* must file all documents, applications, and motions directly with the Clerk's Office. For all litigants, calls to chambers are permitted only in urgent situations that require immediate attention. In urgent situations, e-mails to chambers at <a href="mailto:require:

Communications with Law Clerks: Judge Quraishi permits communications with his law clerks only as to questions regarding chambers' procedures and not as to any substantive matters.

**Extensions of Time to a Deadline:** If consented, extension requests may be done by proposed consent order via CM/ECF. If not consented, follow the regular motion procedure. To adjourn a previously scheduled appearance, obtain consent from your adversary and provide chambers with proposed new dates via CM/ECF.

Adjournment Requests for Hearings/Conferences: Adjournment requests should be made at least two business days before a scheduled hearing or conference. The party seeking an adjournment should attempt to gain the consent of his or her adversary before filing said request by letter. In any such letter, the party should set forth the date of the hearing or conference, the basis for the adjournment request, whether the request is being made with consent, and the length of adjournment being sought. Absent exigent circumstances, adjournment requests made less than two days prior will not be granted.

**Motion Day:** Unless otherwise notified by the Court via CM/ECF, Judge Quraishi decides all motions on the papers and no appearances are required on the motion day.

**Appearances:** Notice of any scheduled appearance, including but not limited to status conferences, settlement conferences, and oral arguments, will be posted on the docket. Where counsel are scheduled to appear in-person, all clients or representatives with settlement authority must be available by phone unless otherwise directed by chambers. The Court expects counsel to arrive at least 15 minutes prior to any appearance.

Rodriguez, Hon. Joseph H.

One Courtesy Copy: Of all papers sent by regular mail to chambers.

Jury Charges: On disk in Word format. Chambers does not accept faxes or e-mail.

Salas, Hon. Esther	
	No courtesy copies of motion papers should be sent to Chambers unless otherwise notified.  Unless otherwise notified by the Court via ECF, Judge Salas decides all motions on the
	papers and no appearances are required on the motion day.
Semper,	Courtesy Copies: By request of the Court only.
Hon. Jamel K.	<b>Jury Charges:</b> Counsel shall provide a copy of proposed jury charges to Chambers in Microsoft Word format via email or thumb drive two weeks before trial, unless directed otherwise by Chambers.
	<b>Motions to Dismiss</b> : Parties must explicitly cite the elements of a claim and how the allegations do or do not give rise to an entitlement of relief. Conclusory allegations unsupported by facts and details will be deemed irrelevant to the Court's analysis.
	Motions for Summary Judgment: Parties may not file an early motion for summary judgment (i.e., prior to the close of fact discovery) without leave from either Judge Semper or the Magistrate Judge assigned to the case. When seeking leave from Judge Semper, the moving party must first submit a letter, no longer than three pages, summarizing the party's substantive argument. Within one week of the moving party's letter, the party opposing the motion must also submit a letter, no longer than three pages, summarizing the party's substantive argument in opposition.
	<b>CM/ECF Filings</b> : Pleadings, motions, letters, and proposed jury charges must be filed in searchable PDF format. Supporting documents, such as exhibits, may be filed in non-searchable PDF format.
	<b>Proposed Orders:</b> If any relief is being sought, the CM/ECF filing must be accompanied by a proposed order in searchable PDF format.
	Communications with Law Clerks: Judge Semper does not permit communications with his law clerks on any substantive matters.
	Extensions of Time to a Deadline: All requests for adjournments or extensions of time, other than those pursuant to Local Rule 7.1(d)(5), must comport with Local Rule 6.1 and include: (1) the date or dates sought to be extended; (2) the number of previous requests for extensions and the Court's ruling; (3) the reason for the current request; and (4) whether the adversary consents and, if not, the reason given by the adversary for refusing to consent. If the requested extension affects any other scheduled dates/deadlines, the request must list the proposed change for all such other dates/deadlines. Adjournment requests should be made at least three business days before a scheduled hearing or conference. The party seeking an adjournment should attempt to gain the consent of his or her adversary before filing said request by letter. In any such letter, the party should set forth the date of the hearing or conference, the basis for the adjournment request, whether the request is being made with consent, and the length of adjournment being sought.
	Absent exigent circumstances, adjournment requests made less than three days prior to the deadline will not be granted.  Pro se Filings: All filings by pro se litigants shall be mailed to or filed directly with the Clerk's

**Briefs (compliance with local rule):** Judge Semper requires strict compliance with the length limitations and format requirements for briefs set forth in L. Civ. R. 7.2 (and any amendments and modifications thereto). Judge Semper enforces the provision in L. Civ. R. 7.2(b) that

Semper.

Office. Documents mailed to the courthouse must be addressed to the Clerk's Office, not Judge

	mandates that a litigant get special permission before submitting papers that are not in compliance.
	<b>Sur-replies</b> : Pursuant to L. Civ. R. 7.1(d)(6), no sur-replies are permitted without leave of the Court. Any request to file a sur-reply must be accompanied by an exhibit consisting of the proposed sur-reply.
Sheridan, Hon. Peter G.	Courtesy Copies: Courtesy Copies of all motion papers in excess of 50 pages in total mailed to chambers marked "Courtesy Copy".  Jury Charges: On disk in Word Perfect format one week before trial.
Shipp, Hon. Michael A.	One Courtesy Copy: Of motion papers, briefs, letters and proposed orders marked "Courtesy Copy" sent by regular mail to chambers.
	Consent Orders, Stipulations, Proposed Orders (other than proposed orders accompanying motion papers): Should be electronically filed as an attachment to a cover letter.
	<b>Pleadings/Correspondence</b> : All pleadings and correspondence to the Court (with the exception of confidential settlement position letters) must be electronically filed.
Wigenton, Hon. Susan D.	
	<b>Courtesy Copy</b> : One courtesy copy of motion papers, as required in the Court's Policy and Procedures and marked "Courtesy Copy," shall be mailed to Chambers the same day the papers are filed on ECF. All correspondence and proposed orders must be submitted via ECF.
	<b>Jury Charges</b> : Counsel shall provide a copy of proposed jury charges to Chambers in Microsoft Word format via email or thumb drive one week before trial.
	Faxes: Parties must contact Chambers for approval before faxing any documents. There is a three (3) page limit for all faxes unless otherwise approved by Chambers.
	Final Pretrial Order Form

# Williams, Hon. Karen M.

Letters Containing Confidential Information may be submitted by email, with the heading 'CONTAINS CONFIDENTIAL INFORMATION" in bold typeface.

Electronic submissions - All parties, with the exception of pro se parties, shall file all documents, in both civil and criminal matters, via ECF. All papers electronically submitted shall, to the extent possible, be submitted in a text-searchable PDF format.

One Courtesy Copy of Motion Papers: As required in the Court's Policy and Procedures, one courtesy copy of motion papers marked "Courtesy Copy," shall be mailed to Chambers the same day the papers are filed on ECF.

All Pretrial Submissions such as voir dire, jury instructions, and verdict sheets shall be submitted in hard copy form to Chambers and via email (njdnef Williams@njd.uscourts.gov) in Word format.

Refer to the document Individual Judicial Preferences & Procedures for guidance on matters before the Hon. Karen M. Williams.

# Magistrate Judges Preferences

Allen, Hon. Jessica S.

Standing Orders: No formal motions are permitted unless leave of court is first obtained except for motions under Federal Rule of Civil Procedure 12(b) or motions to remand that must be filed within thirty days of removal under 28 U.S.C. § 1447(c). Full compliance with Local Civil Rules 16.1 and 37.1 will be expected.

**Pro hac vice:** If consented, e-file a letter indicating consent and enclosing a proposed form of Order, a certification of admission and good standing, and a certification of local counsel stating that counsel shall comply with Local Civil Rule 101.1(c).

#### **Motion Practices:**

Dispositive Motions: Shall comply with the procedures set forth in Local Civil Rule 7.1 for all motions.

Motions to Seal: In addition to electronically filing materials subject to a motion to seal pursuant to Local Civil Rule 5.3, a copy of such materials shall be submitted by email to JSA orders@njd.uscourts.gov, identifying them as "Confidential Materials subject to Motion to Seal." With motion papers, counsel should submit a form of order containing proposed findings of fact and conclusions of law regarding the Local Civil Rule 5.3(c) factors.

Extensions of Time - If consented, may be done by consent order. If not consented, follow regular motion procedure (electronic filing).

Correspondence and written submissions not containing confidential information: Shall be electronically filed via CM/ECF. Papers shall not be submitted by facsimile unless otherwise

	directed.
	Confidential settlement letters and discovery dispute letters containing information subject to a Discovery Confidentiality Order: May be submitted by email to JSA_orders@njd.uscourts.gov.  Telephone Conferences: Are permitted but must be initiated by letter informally outlining the
	issues to be discussed.
	Communications with the Court: Direct communication with law clerks is permitted as to procedural matters only.
	Courtesy copies: One courtesy copy of all submissions exceeding 20 pages should be sent by regular mail to chambers.
	Applications to amend or supplement pleadings: Counsel shall circulate any desired amendment and shall seek written consent of all parties, as per Federal Rule of Civil Procedure 15(a)(2), before pursuing amendment by motion. Any request for leave of the Court to file a motion to amend must contain a redlined version of the proposed amended pleading as an exhibit. If a party seeks to file a motion to amend after the deadline set by a Scheduling Order, that party must show good cause why the amendment could not have been sought earlier pursuant to Federal Rule of Civil Procedure 16.
	Criminal: The Court will not consider a request for bail or bail modification until after defense counsel has consulted with the U.S. Attorney's Office and U.S. Pretrial Services has assessed the proposed bail package.
Almonte,	
José R.	
	Judge Almonte Judicial Preferences
	1

Arpert, Hon. Douglas E.

**Proposed Orders** should be sent by email to dea\_orders@njd.uscourts.gov, preferably in Word format. Proposed Orders filed with formal motions need not be sent. **Standing Orders for Settlement Conferences**: Unless specifically instructed otherwise by the Court, clients with full settlement authority are required to appear in person at the conference. Counsel alone, even if he or she possesses full settlement authority, is insufficient. The client must also appear in person unless the Court has specifically instructed otherwise.

If a settlement memorandum is to be submitted, it must be emailed to chambers (dea\_orders@njd.uscourts.gov) at least 3 business days before the scheduled settlement conference and should not exceed 4 pages in length.

**Courtesy Copies**: By request of the Court only.

Consent Orders may be emailed or faxed directly to chambers.

**Pro Hac Vice** admission, if consented, may be done by consent order accompanied by supporting documents consistent with the requirements of Local Civil Rule 101.1(c). If not consented, follow regular motion procedure.

**Extensions of Time**: Requests for extension of time must be in writing and must indicate whether all parties consent to the extension.

Adjournment Requests shall only be considered if made at least 2 business days prior to a scheduled conference. The party seeking an adjournment should attempt to gain the consent of his or her adversary before submitting said request. The adjournment request should be made in writing and emailed to chambers (dea\_orders@njd.uscourts.gov). The email should set forth the date of the conference, the basis for the adjournment request, whether the request is being made with consent and the length of adjournment being sought. Absent exigent circumstances, adjournment requests made the day of or before a conference shall not be granted.

**Telephone Conferences**: Judge Arpert does not accept dial-in numbers for conference calls. **Communications with the Court**: Judge Arpert permits counsel to email any correspondence that would normally be mailed to chambers to: dea\_orders@njd.uscourts.gov. Alternatively, correspondence (not exceeding 20 pages including attachments) may be faxed to chambers at (609) 989-0451.

Correspondence should only be submitted to chambers via <u>one method</u>: e.g., correspondence emailed to chambers should not also be mailed or faxed, and correspondence faxed to chambers should not also be mailed or emailed.

Courtroom Opportunities for Newer Attorneys: The Court recognizes the importance of the development of future generations of practitioners through courtroom experience and encourages the participation of newer attorneys (practicing less than 7 years) in proceedings before the Court. To that end, upon notice and at the request of any party, the Court will, if it is practicable to do so, (1) grant a request for oral argument on a motion to be argued by a newer attorney; (2) favorably consider allocating additional time for oral argument to accommodate a newer attorney arguing a motion; and (3) permit more experienced counsel of record to provide assistance to the newer attorney arguing the motion, where appropriate, during oral argument.

Bongiovanni, Hon. Tonianne J. **Proposed Orders**: Sent by e-mail to tjb\_orders@njd.uscourts.gov in Word format. Orders on formally filed motions need not be sent.

Standing Orders for Settlement Conferences: Unless specifically instructed otherwise by the Court, clients with full settlement authority are required to appear in person at the conference. Counsel alone, even if he possesses full settlement authority, is insufficient. The client must also appear in person unless the Court has specifically instructed otherwise. If submission of a settlement memorandum is required or, even if not required, a settlement memorandum will be submitted, it must be emailed to chambers (tjb\_orders@njd.uscourts.gov) at least 3 business days before the scheduled settlement conference and should not exceed 5 pages in length.

**Courtesy Copy**: By request of the court.

**Consent Orders**: Emailed or faxed directly to chambers.

**Pro Hac Vice**: If consented, may be done by consent order e-mailed or faxed to chambers. If not consented, follow regular motion procedure.

**Extensions of Time**: If consented may be done by consent order. If not consented, follow regular motion procedure.

**Adjournment Requests** shall only be considered if made at least 2 business days prior to a scheduled conference. The party seeking an adjournment should attempt to gain the consent of his adversary before submitting said request. The adjournment request should be made in writing and emailed to chambers (tjb\_orders@njd.uscourts.gov). The email should set forth the date of the conference, the basis for the adjournment request, whether the request is being made with consent and the length of adjournment being sought. Absent exigent circumstances, adjournment requests made the day of or before a conference shall not be granted.

**Telephone Conferences**: Judge Bongiovanni does not accept dial-in numbers prior to conference calls. If a dial- in number is necessary, then once all of the attorneys have dialed into a scheduled call, the party initiating the call shall contact chambers and provide the dial-in number at that time.

In addition, to the extent a party intends to submit a status letter or discovery dispute in advance of a scheduled telephone conference, the letter must be submitted at least 3 business days prior to the conference. The letter may be emailed to chambers (tjb\_orders@njd.uscourts.gov). Letters submitted after that date likely will not be reviewed or considered prior to or during the conference.

Communications with the Court: Judge Bongiovanni permits counsel to email any correspondence that would normally be mailed to chambers to: tjb\_orders@njd.uscourts.gov. Short submissions (not more than 20 pages including attachments) may be faxed to chambers at (609) 989-0435.

Correspondence should only be submitted to chambers via one method: correspondence mailed to chambers should not also be faxed or emailed; similarly, correspondence emailed to chambers should not also be mailed or faxed; and correspondence faxed to chambers should not also be mailed or emailed. Judge Bongiovanni permits communications with her law clerks only as to questions regarding chambers' procedures and not as to any substantive matters.

Clark, III, Hon.	
James B.	
	Judge Assignment: Magistrate Judge Clark is teamed with Judges Cecchi and Arleo. Procedure to Admit Counsel Pro Hac Vice: When no party objects, Magistrate Judge Clark requires only a form of order with supporting documents consistent with the requirements of L. Civ. R. 101.1(c), including a certification of admission and good standing and a certification of local counsel stating that it shall comply with L. Civ. R. 101.1(c). Application may be made informally by letter, however, all submissions shall be electronically filed.
	Motion Practice: Discovery Disputes: No discovery motion shall be filed without leave of the Court. Magistrate Judge Clark requires the parties first meet their obligations under L. Civ. R. 37.1 to meet and confer to attempt to resolve discovery disputes without the court's intervention. Should counsel fail in this effort, the party raising the dispute should submit a brief letter (no more than 5 pages) advising the Court of the dispute and what actions have been taken to resolve the issues. The non-moving party should submit a response within two days (not to exceed 5 pages). Thereafter, Magistrate Judge Clark will either conduct an informal oral argument, enter an appropriate briefing schedule, or order the parties to meet and confer to prepare joint submissions.
	Motions to Amend: Must be accompanied by a red-lined proposed amended complaint as an exhibit outlining the proposed amendments.
	<b>Communications with the Court</b> : Magistrate Judge Clark will accept submissions of less than 20 pages by fax (973-645-3020). Direct communication with law clerks is permitted as to procedural matters only.
	Courtesy Copies: No courtesy copies necessary.
	Copies of Papers: Confidential settlement memoranda, joint discovery plans, discovery disputes with information subject to discovery confidentiality orders, and informal adjournment requests shall sent via fax or email at jbc_orders@njd.uscourts.gov. All other papers, all other discovery disputes, and proposed orders (submitted with cover letters), shall be electronically filed.
	<b>Probation Report</b> : Magistrate Judge Clark does not permit the defendant or counsel to review the Probation Department's recommendations as to a sentence.
Day,	
Hon. J. Brendan	Civil Case Management Order
	Template Joint Discovery Plan

Donio, Hon. Ann Marie

#### **Judicial Preferences**

**Procedure to Admit Counsel** *Pro Hac Vice* – Magistrate Judge Donio requires the filing of a formal motion to admit counsel pro hac vice. The motion should indicate whether all counsel consent or if there is an objection. Counsel should follow L. CIV. R. 101.1(c) and the comment thereto.

Confidentiality Orders - The parties are encouraged to use the form discovery confidentiality order found at Appendix S of the Local Rules. If the parties submit their own version of a confidentiality order, which differs from Appendix S, they must submit: (1) a clean version of the proposed order that is ready for signature, and (2) an additional version that shall indicate in what respect(s) it differs from Appendix S by bracketing or striking through materials to be deleted and underlining materials to be added.

**Motions to Seal** – In addition to filing materials subject to a motion to seal with the Clerk pursuant to L. CIV. R. 5.3, a copy of such materials should be submitted to chambers in a sealed envelope marked "Courtesy copies of documents designated as confidential materials filed pursuant to L. CIV. R. 5.3."

**Motions to Amend** - Any motion to amend or supplement shall attach a proposed amended pleading and delineate how the proposed amended pleading differs from the pleading which it proposes to amend by either bracketing or striking through materials to be deleted and/or underlining additional materials. *See* L. CIV. R. 15.1(a)(2) (eff. 5/10/2017).

**Settlement Conferences** – Refer to the document "Order Concerning Settlement Conferences" on the Court's website for guidance.

**Telephone Conferences** – Magistrate Judge Donio is amenable to telephone conferences in lieu of formal in-court hearings on motions and may conduct initial and status conferences by telephone.

Adjournment Requests - The party seeking an adjournment should attempt to gain the adversary's consent before submitting the request. The adjournment request should be made in writing and should set forth the date of the conference, the basis for the adjournment request, whether the request is being made with consent, and the length of adjournment being sought.

**Copies of Papers** – Magistrate Judge Donio requires that a courtesy copy of briefs, letter memoranda, motion papers, and proposed orders be submitted to chambers for the Court's convenience.

**Discovery Letters and Motions** - Counsel shall meet and confer in a good faith attempt to informally resolve all discovery or case management disputes before seeking the Court's intervention. *See* Local Civil Rule 37.1(a)(1). Absent exigent circumstances, the Court expects parties to "meet and confer" inperson, via telephone, or video conference before making a discovery application. Any dispute not resolved shall be brought to the Court's attention by letter after counsel's good faith attempt to resolve the dispute has failed and shall set forth in detail the specific efforts that were made to resolve the dispute before contacting the Court. No discovery motion shall be made without prior leave of Court. *See* Local Civil Rule 37.1(b).

**Extensions of Time** - Any application for an extension of time beyond the deadlines set herein shall be made prior to expiration of the period sought to be extended and shall disclose in the application all such extensions previously obtained, the precise reasons necessitating the application showing good cause under FED. R. CIV. P. 16(b), and whether adversary counsel agree with the application.

Espinosa, Hon. André M.

- Civil Case Management Order
- Joint Discovery Plan
- Court-ordered telephone conferences: Dial 866-434-5269 and enter access code 1874589#

# Goodman, Hon. Lois H.

**Proposed Orders** should be sent by email to chambers at lhg\_orders@njd.uscourts.gov, preferably in WORD format.

Courtesy Copies should NOT be mailed to Chambers unless specifically requested by the Court. Consent Orders should be emailed directly to chambers at the address above.

**Pro Hac Vice** if consented may be emailed to chambers as a consent order to the address above with the appropriate certifications under <u>Local Civil Rule 101.1(c)</u>. If not consented, follow regular motion procedure.

**Confidential Settlement Statements** should be emailed directly to chambers at the address above. **Extensions of Time** should be requested in writing and emailed to chambers at the address above. The party seeking an extension should attempt to gain the consent of his or her adversary before submitting said request. The correspondence should set forth the basis for the extension request, whether the request is being made with consent, and the length of extension being sought. Any request should include a proposed order for the Court's consideration.

Adjournment Requests should be made in writing and emailed to chambers at the address above. The party seeking an adjournment should attempt to gain the consent of his or her adversary before submitting said request. The correspondence should set forth the date of the conference, the basis for the adjournment request, whether the request is being made with consent and the length of adjournment being sought.

Motions to Seal must be filed electronically in accordance with Local Civil Rule 5.3(c).

# Hammer, Hon. Michael A.

**One Courtesy Copy**: One courtesy copy of motion papers and briefs sent by regular mail to chambers.

**Pro Hac Vice**: Where no other party objects, counsel may file a form of order, a certification of admission and good standing, and a certification of local counsel stating that it shall comply with L.Civ.R. 101.1(c). If not consented, follow regular motion procedure.

Proposed Orders: Electronically filed.

Letters: Electronically filed.

Joint Discovery Plan: Electronically filed.

**Confidential Memorandums**: Faxed directly to chambers (973-776-7861)

Please Note: Parties must contact chambers for approval before faxing any documents.

# King, Hon. Sharon A.

Letters for Extensions of Time and Adjournment Requests shall be made in writing, filed on the docket, and must indicate whether all parties consent.

**Standing Orders for Settlement Conferences:** Unless specifically instructed otherwise by the Court, clients with full settlement authority are required to appear in person at the settlement conference.

Each party shall submit a settlement memorandum by email at least three (3) business days before the scheduled settlement conference. The memorandum should not exceed five (5) pages in length, including exhibits. If additional exhibits are desired, parties may offer these exhibits during the conference. Email memorandum to nidnef king@nid.uscourts.gov.

**Proposed Joint Discovery Plans** shall be filed on the docket.

**Proposed Joint Final Pretrial Orders** shall be emailed to nidnef king@nid.uscourts.gov.

All Other Proposed Orders shall be filed on the docket and must indicate whether all parties consent.

**Pro Hac Vice Motions,** in accordance with Local Rule 101.1(c), must be filed on the docket. A courtesy copy shall be mailed to Chambers and must indicate whether all counsel consent.

**Motions to Seal,** in accordance with Local Civil Rule 5.3(c), must be filed on the docket. A courtesy copy of any document sought to be sealed should also be mailed to chambers with the proposed redactions highlighted to facilitate the Court's review.

**One courtesy copy** of motion papers, briefs, and any other submissions exceeding twenty (20) pages shall be mailed to Chambers.

Pascal, Hon. Elizabeth A.

- 1. Communications with the Court. In civil cases, all written submissions to the Court, apart from submissions by *pro se* parties, shall be filed electronically via ECF. Confidential settlement memoranda, however, should be submitted directly via email to <a href="mailto:njdnef">njdnef</a> pascal@njd.uscourts.gov. Counsel may contact chambers by telephone with procedural questions but all questions regarding substantive matters should be in writing and electronically filed via ECF.
- 2. Telephone Conferences. For all telephone conferences, the Court will use the telephone number 1-856-210-8988. After dialing in, Counsel will need to enter an access code, which changes for each conference. Counsel should refer to the order scheduling the conference for the specific access code.
- **3.** Courtesy Copies. One (1) copy of all filed papers, briefs, or other submissions exceeding twenty (20) pages per individual document shall be mailed to Chambers. Exhibits to any papers should be separated with corresponding exhibit tabs.
- **4. Proposed Joint Discovery Plans.** Proposed Joint Discovery Plans should be submitted to the Court via ECF.
- 5. Confidentiality Orders. The parties are encouraged to use the form Discovery Confidentiality Order found at Appendix S of the Local Civil Rules. If the parties submit their own version of the Appendix S Discovery Confidentiality Order, they must submit: (1) a clean version of the proposed Order that is ready for signature; and (2) an additional version that indicates in what respect(s) it differs from Appendix S by bracketing or striking through materials to be deleted and underlining materials to be added. The Order should be signed by all counsel or an accompanying cover letter should state whether all parties consent to the form of order.
- **6. Adjournments.** Adjournment requests shall be made in writing, filed on the docket, and indicate whether all parties consent.
- 7. Extensions. Extension requests shall be made in writing, filed on the docket, and indicate whether all parties consent. All applications regarding motions returnable before a District Judge shall be presented to the District Judge.
- 8. Discovery Disputes and Applications. Counsel shall meet and confer in a good faith attempt to informally resolve all discovery or case management disputes before seeking the Court's intervention. See L. Civ. R. 37.1(a)(1). Absent exigent circumstances, the Court expects parties to "meet and confer" in person, via telephone, or by video conference before making a discovery application. Any dispute not resolved shall be brought to the Court's attention by letter filed on the docket after counsel's good faith attempt to resolve the dispute has failed. The letter shall set forth the specific efforts the parties made to resolve the dispute before contacting the Court. No discovery motion shall be made without prior leave of Court. See L. Civ. R. 37.1(b).
- **9. Motions to Amend.** Motions to amend must comply with Local Civil Rule 15.1 and shall be accompanied with a proposed amended pleading with red-lined edits that clearly indicate the proposed changes.
- **10. Motions to Seal.** Motions to seal must comply with Local Civil Rule 5.3(c) and shall be filed on the docket. Counsel shall make every effort to secure the consent of all parties

regarding the request to seal and the movant shall certify whether all parties consent to the application.

- 11. *Pro Hac Vice* Applications. Counsel shall file a formal motion to admit counsel *pro hac vice*. The motion should be filed on the docket and indicate whether all counsel to the motion. Counsel should follow Local Civil Rule 101.1(c) and the comment thereto.
- 12. Settlement Conferences. Unless the Court specifically instructs otherwise, clients with full settlement authority are required to appear in person at the settlement conference. Each party shall submit a confidential settlement memorandum of no more than five (5) double-spaced pages, including exhibits, via email to <a href="mailto:njdnef\_pascal@njd.uscourts.gov">njdnef\_pascal@njd.uscourts.gov</a> at least three (3) business days before the scheduled conference. The settlement memorandum shall outline the party's respective position(s); identify information that is most important to the client and any barriers to settlement; identify the contemplated terms material to a settlement; and detail the demand(s) and offer(s) made to date.
- 13. Final Pretrial Conferences. The Court conducts final pretrial conferences pursuant to Federal Rule of Civil Procedure 16(e). The Court expects parties to engage in meaningful settlement discussions at final pretrial conferences. If the Court directs, clients must attend the conference, but in all circumstances, clients must be on call so that any settlement proposals made at the conference can be immediately conveyed. Unless the Court directs otherwise, the plaintiff shall be responsible for submitting the joint proposed final pretrial order via email to nidnef pascal@nid.uscourts.gov. For cases in the Camden vicinage, the for preparing the Order be found instructions can at http://www.njd.uscourts.gov/sites/njd/files/pretrialorder%20camden.pdf.
- 14. Participation by Junior Attorneys: The Court encourages the participation of less experienced attorneys (i.e., those with less than five years' experience) in all proceedings, including pretrial conferences, hearings on discovery disputes, and oral arguments, particularly where that attorney played a substantial role in drafting the underlying filing. The Court is also more likely to grant oral argument if a party represents, at the time of the filing of the motion or request for argument, that a junior attorney will present the argument. The Court is amenable to permitting more than one lawyer to argue for one party if this creates an opportunity for a junior lawyer to participate.

Singh, Hon. Rukhsanah L.

The following shall apply to civil matters assigned to Magistrate Judge Rukhsanah L. Singh. Failure to comply with the terms of this Order may result in sanctions pursuant to the Federal Rules of Civil Procedure 16(f) and 37.

- 1. Communications with the Court. All communications to the Court shall be in writing via CM/ECF, unless otherwise directed or permitted by the Court. Telephone calls to chambers will be permitted as to administrative matters only or as otherwise directed by the Court. Email and fax communications will not be accepted or considered unless expressly authorized by the Court.
- 2. Adjournments. Conferences are scheduled with ample notice to the parties. Adjournment requests shall only be considered if made at least two (2) business days prior to a scheduled conference. The party seeking an adjournment should attempt to gain the consent of all other parties before submitting said request. The request should be made in writing via CM/ECF as a letter request. The request must set forth: (a) the date of the conference; (b) the length of adjournment requested; (c) the basis for the adjournment request; (d) whether all parties consent to or oppose the request; and (e) whether the adjournment request, if granted, would impact other scheduled dates or deadlines. Absent exigent circumstances, adjournment requests made after two (2) business before a

conference shall not be granted.

- **3.** Extensions. Requests for extensions of time shall only be considered if made at least two (2) business days prior to a scheduled deadline. The party seeking an extension of time should attempt to gain the consent of all other parties before submitting said request. The request should be made in writing via CM/ECF as a letter request. The request must set forth: (a) the currently scheduled deadline(s) sought to be extended; (b) the length of extension requested; (c) the basis for the extension request; (d) whether all parties consent to or oppose the request; and (e) whether the extension request, if granted, would impact other scheduled dates or deadlines.
- **4. Courtesy Copies.** One (1) copy of all filed papers exceeding ten (10) pages per individual document shall be provided to Chambers by mail or personal delivery. Exhibits to any papers should be separated with corresponding exhibit tabs.
- **5. Formal Motions.** Other than motions filed under Federal Rule of Civil Procedure 12, motions to remand within the time provided by 28 U.S.C. § 1447(c), and motions expressly permitted by this Case Management Order, formal motions shall not be filed without prior leave from this Court.
- **6. Discovery Disputes and Applications.** Discovery disputes and applications shall proceed in accordance with Local Civil Rules 16.1 and 37.1. Should counsel fail in their good faith efforts to resolve the dispute by conferring pursuant to Local Civil Rule 37.1, the matter shall be brought to the Court's attention through a joint letter that sets forth:
  - (a) the request;
  - (b) the response;
  - (c) efforts to resolve the dispute;
  - (d) the position of the complaining party;
  - (e) the position of the responding party; and, if applicable,
  - (f) the efforts of a party to contact a non-responsive party to meet and confer and submit the joint letter.

No further letter submissions regarding the dispute may be submitted without leave of Court. All letters should be double-spaced and submitted via CM/ECF, unless such letters contain information subject to a Discovery Confidentiality Order, in which case they may be submitted via email to RLS orders@njd.uscourts.gov.

Formal discovery motions may be filed only upon leave of Court and only after the parties have proceeded in accordance with Local Civil Rules 16.1 and 37.1.

Motions to secure enforcement of a subpoena or to quash a subpoena involving third parties must be made with notice to the relevant third party.

- 7. Motions to Amend. Motions to amend must comply with Local Civil Rule 15.1 and shall be accompanied with a proposed amended pleading with black- or red-lined edits that clearly indicate the proposed changes.
- **8. Motions to Seal.** Motions to seal must comply with Local Civil Rule 5.3(c) and must include a proposed order and proposed findings of fact and conclusions of law. In addition, the proposed order must include reference to the docket entries the party seeks to seal. Counsel shall make every effort to secure the consent of all parties regarding the request to seal and the movant shall certify

as to whether all parties consent in its application.

- **9.** Confidentiality Orders. The parties are encouraged to use the form discovery confidentiality order found at Appendix S of the Local Civil Rules. If the parties submit their own version of a confidentiality order, which differs from Appendix S, they must submit: (1) a clean version of the proposed order that is ready for signature; **and** (2) an additional version that shall indicate in what respect(s) it differs from Appendix S by bracketing or striking through materials to be deleted and underlining materials to be added.
- 10. Confidential Submissions. Settlement letters and discovery dispute letters containing information subject to a Discovery Confidentiality Order may be submitted to the Court via email to RLS orders@njd.uscourts.gov.
- 11. Pro hac vice Applications. Requests for pro hac vice admission should be made by informal letter application filed via CM/ECF. The application shall comply with Local Civil Rule 101.1(c) and include a proposed form of order. The applicant shall set forth whether all parties consent to the application. Any party opposing an application for pro hac vice admission must submit a letter stating forth its basis for the opposition within two (2) business days of the filing of the initial application for admission.
- 12. Settlement Conferences. Trial counsel as well as persons with full settlement authority must appear at settlement conferences, unless prior permission has been granted to participate by telephone. The parties must exchange a demand and offer <u>before</u> the settlement conference.

Each party shall submit, by email to <u>RLS orders@njd.uscourts.gov</u>, a confidential settlement memorandum of no more than ten (10) double-spaced pages no later than five (5) business days before the conference. The settlement memorandum shall: outline the party's respective position(s); identify information on what is important to the client and any barriers to settlement; identify the contemplated terms material to a settlement; and detail the demand(s) and offer(s) made to date.

If trial counsel and clients do not comply with this Order, the settlement conference may be canceled or rescheduled and the noncompliant party and/or attorney may be sanctioned, which may include an assessment of the costs and expenses incurred by those parties who appeared as directed.

13. Final Pretrial Conferences. The Court conducts final pretrial conferences pursuant to Federal Rule of Civil Procedure 16(e). The parties shall contact Chambers for a model version of the joint final pretrial order applicable to the District Judge assigned to the matter. The Court expects to engage in meaningful settlement discussions at final pretrial conferences. Therefore, trial counsel as well as persons with full settlement authority must attend the conferences, unless prior permission has been granted to participate by telephone. The Final Pretrial Conference will proceed even if there are dispositive motions pending.

The parties shall submit, by email and regular mail, one (1) copy of the joint proposed final pretrial order no later than three (3) weeks before the conference.

If the parties do not comply with this Order, the final pretrial conference may be canceled or rescheduled and the attorney may be sanctioned, which may include an assessment of the costs and expenses incurred by those parties who appeared as directed.

Rukhsanah L. Singh Sample Joint Discovery Plan

Skahill, Hon. Matthew J. Unless otherwise directed, the Court will use telephone number 888-808-6929, access code 2170922# for all telephone conferences.

COMMUNICATIONS WITH THE COURT: In civil cases, all written submissions to the Court, unless otherwise directed, should be filed electronically via ECF. Confidential settlement memoranda, however, should be submitted directly via email to njdnef\_skahill@njd.uscourts.gov. Proposed joint discovery plans may also be submitted to this email address. Counsel may contact chambers by telephone with procedural questions but all questions regarding substantive matters should be in writing and electronically filed via ECF. Requests for extensions should be in writing and filed via ECF indicating whether opposing counsel consents. Submissions by fax will not be accepted without prior approval.

**COPIES OF PAPERS:** Courtesy copies of papers should not be sent to Chambers unless specifically requested or the submission, including exhibits, exceeds 100 pages in length.

**PROCEDURE TO ADMIT COUNSEL PRO HAC VICE:** Magistrate Judge Skahill requires full compliance with Local Civil Rule 101.1(c) and the filing of a formal motion to admit counsel pro hac vice. The motion should indicate whether all counsel consent or if there is an objection.

#### MOTION PRACTICES:

**Dispositive Motions:** Magistrate Judge Skahill follows the procedures of Local Civil Rule 7.1 and does not utilize special procedures with respect to dispositive motions.

*Motions to Seal*: Magistrate Judge Skahill requires that counsel comply with Local Civil Rule 5.3(c).

Motions to Amend: Motions to amend shall comply with Local Civil Rule 15.1. Counsel shall circulate any desired amendment and shall seek written consent of all parties, as per Federal Rule of Civil Procedure 15(a)(2), before pursuing amendment by motion. A motion to amend must contain a redlined version of the proposed amended pleading as an exhibit, as provided for in Local Civil Rule 15.1(a)(2). If a party seeks to file a motion to amend after the deadline set by a Scheduling Order, that party must show good cause why the amendment could not have been sought earlier.

**Schedule:** Magistrate Judge Skahill does not hold oral argument on motions unless requested by the Court. The Court will advise the parties of the date and time of the argument and whether the argument will be held in-person or via a telephone conference. All reasonable efforts will be made to accommodate the schedule of counsel.

**Telephone Conferences:** Magistrate Judge Skahill is amenable to telephone conferences, particularly on scheduling and discovery matters. Magistrate Judge Skahill requires counsel to meet and confer prior to requesting a conference to address discovery disputes. Magistrate Judge Skahill also typically requires letter memoranda in advance of the scheduled conference, as addressed further in the Court's Pretrial Scheduling Order.

**Discovery Disputes:** The protocol for raising discovery disputes is addressed by Magistrate Judge Skahill in the Pretrial Scheduling Order and at the initial conference. The Court requires counsel to meet all of their obligations under Local Rule 37.1 and to attempt to resolve discovery disputes by meeting and conferring in person or by speaking over the telephone. Discovery motions may be filed only upon leave of the Court and after the parties have proceeded in accordance with Local Rules 16.1 and 37.1 and the Court's instructions in the Pretrial Scheduling Order.

CONFIDENTIALITY ORDERS: The parties are encouraged to use the form discovery confidentiality order found at Appendix S of the Local Rules. If the parties submit their own version of a confidentiality order, which differs from Appendix S, they must submit: (1) a clean version of the proposed order that is ready for signature, and (2) an additional version that shall indicate in what respect(s) it differs from Appendix S by bracketing or striking through materials to be deleted and underlining materials to be added.

**SETTLEMENT CONFERENCES:** Magistrate Judge Skahill will normally require counsel to submit a confidential settlement memorandum at least 3 business days prior to the settlement conference. Unless

otherwise instructed, the settlement memorandum shall not exceed 10 double spaced pages. Counsel may also include exhibits or documents that they intend to refer to or rely on at the conference, which are truly necessary. Magistrate Judge Skahill expects that the submissions will include a candid discussion of the submitting party's strengths and weaknesses in the case. The confidential settlement memoranda should be sent to njdnef\_skahill@njd.uscourts.gov.

Magistrate Judge Skahill requires the plaintiff (and defendant to any affirmative claim) to set out a written good faith demand prior to the conference. The defendant (or other responding party) is required to respond to that demand in writing. The demand and response should be conveyed to the Court as part of each counsel's settlement conference submission.

For in-person conferences, absent leave of the Court, Magistrate Judge Skahill requires that trial counsel and clients with full and complete settlement authority attend the conference in person and remain available for the duration of the conference. For telephonic/Zoom conferences, Magistrate Judge Skahill requires that parties with full and complete settlement authority also be available for the entire conference.

FINAL PRETRIAL CONFERENCES: The parties should be prepared to engage in meaningful settlement discussions at the final pretrial conference. Therefore, at the conference, each party must be represented by an attorney who is vested with full settlement authority. Clients are to be present if directed by Magistrate Judge Skahill but must, in all circumstances, be on call so that any settlement proposals made at the conference can be immediately conveyed. For cases in the Camden vicinage, the parties shall review and follow the instructions and directives for preparing the joint final pretrial order in the Camden vicinage, which are accessible through the Court's website: https://www.njd.uscourts.gov/sites/njd/files/pretrialorder%20camden.pdf
Unless otherwise directed, the plaintiff shall be responsible for submitting the joint

proposed final pretrial order no later than five business days before the conference.

# Waldor, Hon. Cathy L.

Judge Cathy L. Waldor's COVID-19 Judicial Procedures

Civil Case Management Order

Template Scheduling Order PDF - MSWord

Judge Salas Pretrial Scheduling Order (MSWord)

# Wettre, Hon. Leda Dunn

Correspondence and written submissions not containing confidential information: Shall be electronically filed via CM/ECF. Documents shall not be submitted by facsimile unless otherwise directed.

Confidential settlement letters and discovery dispute letters containing information subject to a Discovery Confidentiality Order: May be submitted by email to LDW orders@njd.uscourts.gov.

Formal motions, other than motions filed in lieu of an Answer under Federal Rule of Civil Procedure 12 and motions seeking remand that must be filed within thirty days of removal under 28 U.S.C. § 1447(c): Shall not be filed without prior leave from this Court. Full compliance with Local Civil Rules 16.1 and 37.1 will be expected.

Courtesy copies: Two copies of motion papers on motions referred to this Court; one copy of any other submission exceeding 50 pages. Courtesy copies should be sent by regular mail to chambers. **Applications to amend or supplement pleadings**: Counsel shall circulate any desired amendment and shall seek written consent of all parties, as per Federal Rule of Civil Procedure 15(a)(2), before pursuing amendment by motion. Any request for leave of the Court to file a motion to amend must contain a redlined version of the proposed amended pleading as an exhibit. If a party seeks to file a motion to amend after the deadline set by a Scheduling Order, that party must show good cause why the amendment could not have been sought earlier.

**Pro hac vice**: If consented, e-file a letter indicating consent and enclosing a proposed form of Order and supporting Certifications complying with Local Civil Rule 101.1(c).