UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JUDICIAL PREFERENCES

Rev. 4/15/25

District Judges	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.
	Jury Charges : 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.
	Sample Final Pretrial Order
Bumb, Hon. Renée Marie	Refer to the document: <u>https://www.njd.uscourts.gov/sites/njd/files/ProceduresJudgeReneeMarieBumb.pdf</u> 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.
	<i>Pro se</i> Filings: 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 NOT to Judge Castner.
	Pleadings/Correspondence: All pleadings and correspondence to the Court (with the exception of confidential settlement position letters) must be electronically filed.
	Extensions of Time on Consent : All requests for extensions shall be filed via ECF. Any requests for extensions or adjournments shall indicate whether all parties consent.
	Motion Day: 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.	All Submissions, 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."
	Jury Charges : 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, Hon. Katharine S.	
	MAGISTRATE JUDGE ASSIGNMENT:
	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
	Motions: 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.
	<i>Briefs:</i> 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.
Kiel,	Rules and Preferences
Hon. Edward	indices and Treferences
S.	Order Concerning Citizenship of Unincorporated Business Organization
	Clerkships Applications: Judge Kiel does not accept clerkship applications through OSCAR.
	Candidates should email a cover letter, transcripts (college and law school), writing sample, and
	recommendation letters to chambers. Judge Kiel has filled clerkship positions through the 2027 - 2028 term and will begin accepting application for the 2028 - 2029 term on March 1, 2026.
	Internship Applications: Judge Kiel accepts internship applications by email to the chamber's email
	account. Candidates should submit a cover letter, law school transcript, and writing sample.
	Candidates may also submit recommendation letters. Judge Kiel has filled internship positions
	through the Fall 2025 semester and will begin accepting application for the Spring 2026 Semester on September 1, 2025.

Kirsch,	
Hon. Robert	Judge Robert Kirsch Judicial Preferences
Martini,	STANDING ORDERS:
Hon. William J.	None, except these individual practice rules.
	PROCEDURE TO ADMIT COUNSEL PRO HAC VICE:
	Applications to admit out-of-state counsel pro hac vice are referred to the Magistrate Judge for disposition.
	MOTION PRACTICES:
	<i>Briefs</i> : Judge Martini requires strict compliance with the length limitations and format requirements for briefs set forth in L. Civ. R. 7.2(b) and any amendments and modifications thereto. Judge Martini enforces the provision in that Rule that mandates that a litigant request special permission from the Court before submitting papers that are not in compliance, except that informal letter briefs are permitted when appropriate. All briefs, attachments, and other submissions to the Court must be filed in searchable PDF format.
	Dispositive Motions: Judge Martini requires that the procedures of L. Civ. R. 7.1(b) and L. Civ.
	R. 56.1 be followed.
	Summary Judgment and Statements of Material Fact: Motions for summary judgment must be accompanied by a statement of material fact. Each fact must include a citation to the record evidence with a pin point cite that supports that fact. Facts without citation to record evidence may be disregarded by the Court.
	<i>Oppositions to Motions for Summary Judgment</i> : If a summary judgment motion is opposed, the opposing party shall set forth, in a single document, each paragraph of the moving party's statement of material facts. Directly below each paragraph, the opposing party shall denote whether that fact is disputed or undisputed. If the fact is disputed, the opposing party must include a citation to record evidence with a pin point cite that supports the dispute. Any explanation must also include citation to record evidence with a pin cite. Opposing parties may include additional facts in supplemental paragraphs after responding to each of the movant's statements of material fact. However, responsive statements of material fact without citation and pin cite to record evidence may be disregarded.
	<i>Deposition Transcripts</i> : If a party relies on deposition testimony in support of, or in opposition to, a motion, the party must submit a copy of the entire deposition transcript and any exhibits introduced in that deposition to the Court in searchable PDF format.
	<i>Oral Argument</i> : Oral argument will not be held automatically on the listed return date. If the Court grants the request for oral argument or wishes to hear oral argument on a matter where no request has been made, the Courtroom Deputy shall contact the parties to schedule oral argument. Absent a request for oral argument, the matter will be decided on the papers pursuant to Fed. R. Civ. Pro. 78(b).
	The Court will permit a supervising lawyer to assist a junior lawyer at the argument, if necessary.
	Motions to Seal: Motions to seal are referred to the Magistrate Judge. If a party seeks to restrict public

access to a document, it must comply with L. Civ. R. 5.3, including that "[a]bsent extraordinary circumstances, a party shall not file a motion or other materials with redacted information, absent a confidentiality order which expressly grants leave to file under seal or other appropriate leave of Court." L. Civ. R. 5.3(b)(6). If the parties believe sealing will be necessary, parties should coordinate with the Magistrate Judge in advance of filing.

Telephone Conferences: Judge Martini conducts telephone conferences on motions at the Court's initiation.

COMMUNICATIONS WITH THE COURT:

Judge Martini permits submission of papers via email or fax only with advance permission from Chambers. Communications with the Judge's law clerks are permitted.

COPIES OF PAPERS:

Courtesy Copies: Except for sealed documents, courtesy copies are required to be submitted to the Court by regular mail. For filings larger than 100 pages, parties shall also submit digital courtesy copies in searchable PDF format on a CD-ROM, DVD, or USB drive.

Sealed Filings: All papers filed under seal shall be submitted in unredacted form to the Court in hard copies and digital copies in searchable PDF format on a CD-ROM, DVD, or USB drive.

TRIAL PRACTICES:

Trial Submissions. Trial briefs, proposed voir dire questions, proposed jury instructions, lists of premarked exhibits (tabs), witness lists including the name and address of each potential witness, and requests to charge should be submitted by counsel at least two weeks prior to the commencement of the trial by both email *and* hard copy to the Courtroom Deputy. All hard copies should be organized into binders with appropriate indexes. Four (4) copies of such binders are to be submitted to chambers. Requests to charge should be submitted via email to the Judge's law clerk in Word and PDF format.

Jury Selection: All questions on voir dire will be asked by Judge Martini. Judge Martini follows the standard federal procedure for jury selection in both civil and criminal cases. Thus, there is no designation of alternates in civil cases; alternates are predesignated in criminal cases.

Methods for Peremptory Challenges: Judge Martini prefers that counsel stand and announce their peremptory challenges.

Effect of Pass in Peremptories: Judge Martini requires that a party forfeit any peremptory challenge that could have been, but was not, used in any round where the adversary continues to exercise peremptories.

Juror Note Taking: Judge Martini does not permit jurors to take notes.

Juror Questioning: Judge Martini does not permit jurors to submit questions to the Court to be posed to witnesses.

Jury Charges: Judge Martini provides jurors with a written copy of the jury charge. He charges the jury on substantive matters after closing arguments. He may charge the jury on the substantive law

before closing arguments if counsel requests.

Exhibits: Judge Martini prefers the use of jury books containing exhibits and ordinarily sends all exhibits to the jury room except narcotics, weapons or money. If jurors wish to see such an exhibit during deliberations, they will be permitted to do so in open court. The Courtroom Deputy shall take possession of all exhibits as they are entered into evidence, except narcotics, money and weapons. Possession of these exhibits shall remain with the prosecuting attorney and/or investigating agency throughout the trial.

If counsel intends to use electronic demonstrative evidence at trial, the Court should be notified at least 10 days in advance of trial.

Conference with Jurors: Judge Martini may on occasion hold post-verdict or post-discharge conferences with jurors.

PROBATION REPORT:

Judge Martini does not permit the defendant or counsel to review the Probation Department's recommendations as to sentence.

PARTICULAR CONCERNS:

(1) All submissions, including correspondence, must be electronically filed via CM/ECF. No submissions will be accepted via fax or email without the express consent of Chambers.

(2) All requests should be accompanied by a proposed order.

(3) Failure to follow these individual practice rules may result in the administrative termination of any motion or other request without prejudice.

(4) In appropriate cases, Judge Martini encourages expedient settlement and the use of alternative dispute resolution. The senior attorney in charge of the case or trial counsel must attend all settlement conferences, and the client with full settlement authority must either attend or be immediately available by phone. In cases involving insurance companies and other corporate business entities, it is expected that the executive who will make the final decision on the settlement will be the person available for the conference.

Martinotti, Final Pretrial Order Form

Hon. Brian R.

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 (Lissette_Rodriguez@njd.uscourts.gov).

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

Neals, Hon. Julien X.	
	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.	
	Judicial Preferences
Padin,	
Hon. Evelyn	<u>District Judge Evelyn Padin Preferences</u>
	District Judge Evelyn Padin Proposed Final Pretrial Order
	District Judge Evelyn Padin Clerk and Intern Hiring Preferences

Ormiali	
Quraishi, Hon.	
Zahid N.	Pre-Motion Conference (starting 05/01/2022): 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 <i>pro se</i> .
	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 <i>pro se</i> 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 Quraishi.
	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>i.e.</i> , 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,

	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.
Salas, Hon. Esther	
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.
Rodriguez,	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.
	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.
	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.
	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.
	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.
	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 <u>znq_orders@njd.uscourts.gov</u> are preferred to 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.

	Communications with Chambers : Calls to chambers are permitted only in urgent situations that require immediate attention. All other communication with chambers must be filed in a letter on the docket via CM/ECF.
	Communications with Law Clerks: Judge Semper does not permit communications with his law clerks on any substantive matters.
	Law Clerk Applications: Applicants are directed to apply via OSCAR only. Emailed or mailed applications will not be reviewed. Calls to chambers regarding applications are not permitted. Letters of recommendation must be submitted via OSCAR.
	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.
	Courtesy Copies: By request of the Court only.
	Civil Jury Trial Preferences
	Motions to Dismiss : 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.
	Proposed Orders: If any relief is being sought, the CM/ECF filing must be accompanied by a proposed order in searchable PDF format.
	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 Office. Documents mailed to the courthouse must be addressed to the Clerk's Office, not Judge Semper.
	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 mandates that a litigant get special permission before submitting papers that are not in compliance.

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. Sample Final Pretrial Order
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.
	Pleadings/Correspondence : All pleadings and correspondence to the Court (with the exception of confidential settlement position letters) must be electronically filed.
Wigenton, Hon. Susan D.	Courtesy Copy : 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.
	Jury Charges : 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 <i>pro se</i> 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
Adams, Hon.	
Stacey D.	
	Judge Stacey D. Adams Judicial Preferences
	Joint Discovery Plan Template
	Final Pretrial Order Form Template

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:
	<i>Dispositive Motions:</i> Shall comply with the procedures set forth in Local Civil Rule 7.1 for all motions.
	<i>Motions to Seal:</i> 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 pursuan 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, Hon. José R.	Judge Almonte Judicial Preferences
Bergman, Hon. Andrea D.	Judge Bergman Judicial Preferences

Domoiovonni Hon	Proposed Orders : Sent by e-mail to tjb_orders@njd.uscourts.gov in Word format.
Bongiovanni, Hon. Tonianne J.	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.
	Communications with the Court : 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.
	Probation Report : Magistrate Judge Clark does not permit the defendant or counsel to review the Probation Department's recommendations as to a sentence.
Dura	
Day, Hon. J. Brendan	Civil Case Management Order
	Template Joint Discovery Plan

Donio,	Judicial Preferences
Hon. Ann Marie	Procedure to Admit Counsel <i>Pro Hac Vice</i> – 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. <i>See</i> 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. <i>See</i> 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. <i>See</i> 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.	 <u>Civil Case Management Order</u> <u>Joint Discovery Plan</u> Court-ordered telephone conferences: Dial 866-434-5269 and enter access code 1874589#

Hammer,	One Courtesy Copy: One courtesy copy of motion papers and briefs sent by regular
Hon. Michael A.	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 Settlement Memorandums - Each party must mail a tabbed memorandum to Chambers
	one week prior to the settlement conference. The memorandum may not exceed five double-spaced
	pages, excluding exhibits. Any video or audio files must be submitted via a USB. The USB must be
	clearly marked with the case name, docket number, and the identity of the party.
	Please Note: Parties must contact chambers for approval before faxing any documents.
King,	Letters for Extensions of Time and Adjournment Requests shall be made in writing, filed on the
Hon. Sharon A.	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 <u>njdnef_king@njd.uscourts.gov</u> .
	Proposed Joint Discovery Plans shall be filed on the docket.
	Proposed Joint Final Pretrial Orders shall be emailed to <u>njdnef_king@njd.uscourts.gov</u> .
	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
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	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 <i>pro se</i> parties, shall be filed electronically via ECF. Confidential settlement memoranda, however, should be submitted directly via email to <u>njdnef pascal@njd.uscourts.gov</u> . 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. <i>See</i> 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 consent 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 <u>njdnef pascal@njd.uscourts.gov</u> 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 preparing instructions for the Order can be found 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.

Quinn,	
Hon. Justin T.	
	Civil Case Management Order
	Case Management Order template
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 <u>RLS orders@njd.uscourts.gov</u>.

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 <u>RLS_orders@njd.uscourts.gov</u>.

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,	Unless otherwise directed, the Court will use telephone number 888-808-6929, access code 2170922# for
Hon. Matthew J.	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: <i>Dispositive Motions</i> : 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).
	<i>Motions to Amend</i> : 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.
	<i>Schedule</i> : 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 <u>PDF</u> - <u>MSWord</u> 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).