

It is hereby ordered:

1. All pleadings, motions, applications, briefs and any and all other papers in this case shall be e-filed with the civil clerk's office, located in the Monterey Courthouse. A courtesy copy shall be mailed [or emailed if directed by the department] via the judge's clerk.

2. All motions and briefs shall conform to California Rules of Court, including rule 3.1113, and indicate on the caption page that this matter has been deemed Complex and is assigned for all purposes to a Complex Litigation Judge.

3. All motions shall be heard on the 2nd and 4th Friday complex law and motion calendar at 8:30 am in the corresponding department of the judicial officer assigned. Any other matters requiring a hearing or settlement conference shall be heard on the 2nd and 4th Tuesday complex case management calendar at 9:00 am in the corresponding department of the judicial officer assigned.

4. The Case Management Conference will be held at 9:00 am on the 2nd and 4th Tuesday of each month in the department of the assigned judge, at the courthouse in Monterey, located at 1200 Aguajito Road, Monterey, California.

5. Counsel for all parties shall meet and confer on all matters set forth in California Rules of Court, 3.750 and 3.724(8).

6. In preparation for the Case Management Conference, counsel for the parties should file a joint written Case Management Conference Statement fifteen (15) court days before the CMC. If the CMC is continued, the new CMC date is operative. The Case Management Statement must not be the standardized Judicial Council form. It must be in prose and detail. The Case Management Statement must include the following:

- a. Status of Pleadings;
- b. Status of Discovery;
- c. Status of Settlement or Mediation;
- d. Conclusions reached after meet and confer on all matters set forth in CRC Rule 3.750 and Rule 3.724(8);
- e. Anticipated motions;
- f. Realistic and timely trial date; if a trial date cannot presently be set, state the reasons and propose a realistic next case management conference date.
- g. Notice of any related case. Cases considered "related" are those that arise out of the same or similar fact situations, the same transaction, occurrence, or series of transactions or occurrences as the cause of action which the plaintiff alleges in this complaint. For example, in a class action wage and hour case, the Court must be informed if a named party is currently litigating a case involving other wage and hour allegations.
- h. Any other matters for which the parties may need Court rulings or scheduling.
Counsel must be prepared to discuss these issues at the Case Management hearing.

7. During discovery, counsel should consider designating each exhibit with one number, to be used by all parties, for all uses, including depositions, motions, and trial. Alternatively, have one side use (for example) numbers 1 – 1000 and the other side use numbers 1001 through 2,000, in order to eliminate the use of letters.

8. The court will consider flexible alternatives to costly litigation, such as

- a. Severing an issue for a bench trial (with or without stipulated facts). In this way the parties can resolve a disputed fact. This may assist the parties in resolving the case;
- b. Informal discovery resolution;
- c. Early motions in limine to narrow the issues. The goal would be to allow the parties to defer expensive discovery issues and proceedings.