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ORIGINAL FILED
Superior Court of California
County of Los Angeles

AUG 22 2016

Sherril R. Carter, Executive Officer/Clerk
By: Cheri Grant, Deputy

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, NORTH DISTRICT**

ANTHONY TAYLOR,
Plaintiff,
v.
SAMANTHA SCHILLING, and
DOES 1 through 50, inclusive,
Defendants.

Case No.: **MC 026518**
COMPLAINT FOR DAMAGES
1. Negligence
DEMAND FOR JURY TRIAL

Plaintiff, ANTHONY TAYLOR, alleges as follows:

GENERAL ALLEGATIONS

1. The true names and capacities whether individual, corporate, associate, or otherwise, of the defendants DOES 1 through 50 are unknown to plaintiff, who therefore sues these defendants by these fictitious names and will ask leave to amend this complaint to show their true names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named defendants are negligently or otherwise responsible in some manner for the occurrences herein alleged and that plaintiff's injuries as herein alleged were proximately caused by that negligence.

COPY

1 2. Plaintiff is informed, believes, and thereon alleges that SAMANTHA
2 SCHILLING is an individual who, at all times mentioned, is a resident of Lancaster,
3 California.

4 3. Plaintiff is informed, believes, and thereon alleges that defendants SAMANTHA
5 SCHILLING and DOES 1 through 50, inclusive, were the owners, maintainers, operators, and
6 controllers of a 2010 Honda Civic with California license plate number 7CHW136.

7 4. At all times mentioned, plaintiff ANTHONY TAYLOR was a passenger in a
8 2001 Lincoln LS with California license plate number 4TKV268.

9 5. At all times mentioned, the intersection of 15th Street West and Avenue O is a
10 public roadway located in unincorporated territory near the City of Lancaster in the County of
11 Los Angeles, in the State of California.
12

13 **FIRST CAUSE OF ACTION**

14 (Negligence)

15 As and for a First Cause of Action, plaintiff complains against defendants,
16 SAMANTHA SCHILLING and DOES 1 through 50, inclusive, and each of them, and alleges:

17 6. Plaintiff repeats and repleads all of the general allegations contained in
18 paragraphs 1 through 5.

19 7. At all times mentioned, defendants, and each of them, owed a duty of care to
20 plaintiff to act in a reasonable, prudent, and careful manner in the entrustment, ownership,
21 operation, maintenance, and control of the vehicles which they owned or operated so as to
22 avoid causing harm or creating a foreseeable risk of harm to others, including plaintiff.

23 8. On or about December 19, 2015, at approximately 4:45 p.m., plaintiff
24 ANTHONY TAYLOR was riding as a passenger in the 2001 Lincoln LS mentioned above that
25 was being operated on Avenue O at the intersection with 15th Street West. At the same time
26 and place, defendant SAMANTHA SCHILLING was operating her 2010 Honda Civic on 15th
27 Street West at the intersection of Avenue O. Defendants negligently and carelessly entrusted,
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1 owned, operated, maintained, or controlled their vehicle so as to cause a collision with plaintiff
2 and in doing so violated California Vehicle Code section 21802 by failing to stop at a stop
3 sign.

4 9. As a proximate result of the negligence and carelessness of the defendants,
5 plaintiff ANTHONY TAYLOR received severe injuries to his body. The injuries received by
6 plaintiff have greatly impaired his health, strength, and activity, and have caused and continue
7 to cause him great mental, physical, and nervous pain and suffering, all to his damage
8 according to proof. Plaintiff is informed, believes, and thereon alleges that the injuries he
9 sustained will result in permanent disability to him, all to his damage according to proof.
10

11 10. As a further, direct and proximate result of the negligence of the defendants,
12 plaintiff ANTHONY TAYLOR was required to and did employ, and continues to employ
13 physicians and others for medical care of his injuries, and did incur medical and incidental
14 expenses according to proof. Plaintiff ANTHONY TAYLOR is informed and alleges that he
15 will incur further medical and incidental expenses for the care and treatment of his injuries, all
16 to his further damage according to proof.

17 11. As a further, direct and proximate result of the negligence of the defendants,
18 plaintiff ANTHONY TAYLOR was prevented from performing his usual occupation and has
19 suffered a reduction in his capacity to work, and as a result has been damaged according to
20 proof. Plaintiff ANTHONY TAYLOR is informed and believes, and on such information and
21 belief alleges that as a result of the negligence of the defendants, he will, in the future, be
22 prevented from attending his usual occupation and will have a reduced capacity to earn
23 income, all to his further damage according to proof.
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For the causes of action alleged above, plaintiff ANTHONY TAYLOR prays for judgment against the defendants as follows:

1. For non-economic damages in an amount according to proof;
2. For economic damages according to proof;
3. For interest and prejudgment interest;
4. Costs of suits herein incurred; and
5. Such other and further relief as the court may deem proper.

DATE: August 22, 2016

R. REX PARRIS LAW FIRM


Jonathan W. Douglass, Esq.
Attorneys for Plaintiffs


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DEMAND FOR JURY TRIAL

Plaintiff demands that all issues of fact in this case be tried to a properly empaneled jury.

DATE: August 22, 2016

R. REX PARRIS LAW FIRM



Jonathan W. Douglass, Esq.
Attorneys for Plaintiffs



LOS ANGELES SUPERIOR COURT

FEB 25 2016

SHERRI R. CARTER, EXECUTIVE OFFICER/ CLERK

C. Casarez
BY C. CASAREZ, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

In re Personal Injury Cases Assigned to the Personal Injury and General Jurisdiction Courts; (NORTH DISTRICT)) Case No.: MC 026518)) FIRST AMENDED GENERAL ORDER RE) PERSONAL INJURY COURT ("PI Court")) PROCEDURES, NORTH DISTRICT) (Effective as of February 22, 2016)
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DEPARTMENT:	A-10 A-11
FINAL STATUS CONFERENCE ("FSC"):	
• Date: _____	at 8:30 a.m.
TRIAL:	
• Date: _____	at 8:30 a.m.
OSC re DISMISSAL (Code Civ. Proc., § 583.210):	
• Date: _____	at 8:30 a.m.

TO EACH PARTY AND TO THE ATTORNEY OF RECORD FOR EACH PARTY:

Pursuant to the California Code of Civil Procedure ("C.C.P."), the California Rules of Court, and the Los Angeles County Court Rules ("Local Rules"), the Los Angeles Superior Court ("LASC" or "Court") HEREBY AMENDS AND SUPERSEDES ALL PREVIOUS AMENDED GENERAL ORDERS AND GENERALLY ORDERS AS

FSC: 10/18/2017 TRIAL: 10/27/2017 OSC: 08/23/2019

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1 Damage/Wrongful Death. An action for intentional infliction of emotional
2 distress, defamation, civil rights/discrimination, or malpractice (other than
3 medical malpractice), is not included in this definition. An action for injury to
4 real property is not included in this definition.” Local Rule 2.3(a)(1)(A).

5 The Court will assign a case to the PI Courts if plaintiff(s) check any of the following
6 boxes in the Civil Case Cover Sheet Addendum:
7

- 8 A7100 Motor Vehicle – Personal Injury/Property Damage/Wrongful
9 Death
- 10 A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured
11 Motorist
- 12 A7260 Product Liability (not asbestos or toxic/environmental)
- 13 A7210 Medical Malpractice – Physicians & Surgeons
- 14 A7240 Medical Malpractice – Other Professional Health Care Malpractice
- 15 A7250 Premises Liability (e.g., slip and fall)
- 16 A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g.,
17 assault, vandalism etc.)
- 18 A7220 Other Personal Injury/Property Damage/Wrongful Death
- 19

20 The Court will not assign cases to the PI Courts if plaintiff(s) check any boxes
21 elsewhere in the Civil Case Cover Sheet Addendum (any boxes on pages two and
22 three of that form).
23

24 The Court sets the above dates in this action in the North District PI Court circled above
25 (Department A-10 or A-11) at the Michael Antonovich Antelope Valley Courthouse located at
26 42011, 4th Street West, Lancaster, Ca 93534. Cal. Rules of Court, Rules 3.714(b)(3), 3.729.
27

1 showing good cause or articulating any reason or justification for the change. To continue or
2 advance a trial date, the parties (or their counsel of record) should jointly execute and file (at
3 the civil clerk's window on the first floor of the Michael Antonovich courthouse; fee
4 required) a Stipulation to Continue Trial, FSC and Related Motion/Discovery Dates (form
5 LACIV AV-242, available on the court's website, Personal Injury Court link or at the civil
6 clerk's window of the Michael Antonovich Courthouse. Parties shall use the Stipulation that
7 is specific to the North District/Michael Antonovich Courthouse). The PI Courts schedule
8 FSCs for 8:30 a.m., on a Wednesday (or other day) that is (7) court days before the trial date.
9 Parties seeking to continue the trial and FSC dates shall file the Stipulation at least eight
10 court days before the FSC date. Parties seeking to advance the trial and FSC dates shall file
11 the Stipulation at least eight court days before the proposed advanced FSC date. Code Civ.
12 Proc., § 595.2; Govt. Code § 70617, subd. (c)(2). In selecting a new trial date, parties shall
13 select any Friday. Parties may submit a maximum of two stipulations to continue trial, and
14 each stipulation will be granted for a maximum of 60 days. A third request to continue trial
15 will only be granted upon a showing of good cause, by ex parte application or noticed
16 motion. This rule is retroactive so that any previously granted stipulation to continue trial
17 will count toward the maximum number of allowed continuances.
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21 **NO CASE MANAGEMENT CONFERENCES**

22 7. The PI Courts do not conduct Case Management Conferences. The parties need not
23 file a Case Management Statement.
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1 pleadings before the date when opposition to the demurrer is due so that the PI Courts do not
2 needlessly prepare tentative rulings on demurrers.

3 **Discovery Motions**

4 11. The purpose of an Informal Discovery Conference (“IDC”) is to assist the parties to
5 resolve and/or narrow the scope of discovery disputes. At this time, IDC is not available in
6 North District PI courts due to the high volume of cases handled by these courts.

7 **Ex Parte Applications**

8 12. Under the California Rules of Court, courts may only grant ex parte relief upon a
9 showing, by admissible evidence, that the moving party will suffer “irreparable harm,”
10 “immediate danger,” or where the moving party identifies “a statutory basis for granting relief
11 ex parte.” Cal. Rules of Court, Rule 3.1202(c). The PI Courts have no capacity to hear multiple
12 ex parte applications or to shorten time to add hearings to their fully booked motion calendars.
13 The PI Courts do not regard the Court’s unavailability for timely motion hearings as an
14 “immediate danger” or threat of “irreparable harm” justifying ex parte relief. Instead of
15 seeking ex parte relief, counsel should reserve the earliest available motion hearing date, and
16 stipulate with all parties to continue the trial to a date thereafter using the Stipulation to
17 Continue Trial, FSC and Related Motion/Discovery Dates (form LACIV AV-242, available
18 on the court’s website, PI Court Tab). Counsel should also check the Court Reservation
19 System from time to time because earlier hearing dates may become available as cases settle
20 or counsel otherwise take hearings off calendar.
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**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
 NOTICE OF CASE ASSIGNMENT - UNLIMITED CIVIL PERSONAL INJURY CASE**
 Case Number _____

MC 026518

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

Your case is assigned for all purposes to the judicial officer indicated below (Local Rule 3.3(c)).

ASSIGNED JUDGE	DEPT	ROOM	ASSIGNED JUDGE	DEPT	ROOM
Hon. Brian C. Yep	A10	3010			
Hon. Randolph A. Rogers	A11	3210			

Given to the Plaintiff/Cross-Complainant/Attorney of Record on AUG 22 2016 SHERRI R. CARTER, Executive Officer/Clerk

By: CHERI [Signature] Deputy Clerk

**NOTICE OF CASE ASSIGNMENT
UNLIMITED CIVIL CASE**

VOLUNTARY EFFICIENT LITIGATION STIPULATIONS



Superior Court of California
County of Los Angeles



Los Angeles County
Bar Association
Litigation Section

Los Angeles County
Bar Association Labor and
Employment Law Section



Consumer Attorneys
Association of Los Angeles



Southern California
Defense Council



Association of
Business Trial Lawyers



California Employment
Lawyers Association

The Early Organizational Meeting Stipulation, Discovery Resolution Stipulation, and Motions in Limine Stipulation are voluntary stipulations entered into by the parties. The parties may enter into one, two, or all three of the stipulations; however, they may not alter the stipulations as written, because the Court wants to ensure uniformity of application. These stipulations are meant to encourage cooperation between the parties and to assist in resolving issues in a manner that promotes economic case resolution and judicial efficiency.

The following organizations endorse the goal of promoting efficiency in litigation and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases.

◆ Los Angeles County Bar Association Litigation Section ◆

◆ Los Angeles County Bar Association
Labor and Employment Law Section ◆

◆ Consumer Attorneys Association of Los Angeles ◆

◆ Southern California Defense Council ◆

◆ Association of Business Trial Lawyers ◆

◆ California Employment Lawyers Association ◆

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.:		FAX NO. (Optional):	
E-MAIL ADDRESS (Optional):			
ATTORNEY FOR (Name):			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
STIPULATION – EARLY ORGANIZATIONAL MEETING			CASE NUMBER:

This stipulation is intended to encourage cooperation among the parties at an early stage in the litigation and to assist the parties in efficient case resolution.

The parties agree that:

1. The parties commit to conduct an initial conference (in-person or via teleconference or via videoconference) within 15 days from the date this stipulation is signed, *to discuss and consider whether there can be agreement on the following:*
 - a. Are motions to challenge the pleadings necessary? If the issue can be resolved by amendment as of right, or if the Court would allow leave to amend, could an amended complaint resolve most or all of the issues a demurrer might otherwise raise? If so, the parties agree to work through pleading issues so that a demurrer need only raise issues they cannot resolve. Is the issue that the defendant seeks to raise amenable to resolution on demurrer, or would some other type of motion be preferable? Could a voluntary targeted exchange of documents or information by any party cure an uncertainty in the pleadings?
 - b. Initial mutual exchanges of documents at the "core" of the litigation. (For example, in an employment case, the employment records, personnel file and documents relating to the conduct in question could be considered "core." In a personal injury case, an incident or police report, medical records, and repair or maintenance records could be considered "core.");
 - c. Exchange of names and contact information of witnesses;
 - d. Any insurance agreement that may be available to satisfy part or all of a judgment, or to indemnify or reimburse for payments made to satisfy a judgment;
 - e. Exchange of any other information that might be helpful to facilitate understanding, handling, or resolution of the case in a manner that preserves objections or privileges by agreement;
 - f. Controlling issues of law that, if resolved early, will promote efficiency and economy in other phases of the case. Also, when and how such issues can be presented to the Court;
 - g. Whether or when the case should be scheduled with a settlement officer, what discovery or court ruling on legal issues is reasonably required to make settlement discussions meaningful, and whether the parties wish to use a sitting judge or a private mediator or other options as

SHORT TITLE:	CASE NUMBER:
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discussed in the "Alternative Dispute Resolution (ADR) Information Package" served with the complaint;

- h. Computation of damages, including documents, not privileged or protected from disclosure, on which such computation is based;
 - i. Whether the case is suitable for the Expedited Jury Trial procedures (see information at www.lacourt.org under "Civil" and then under "General Information").
2. The time for a defending party to respond to a complaint or cross-complaint will be extended to _____ for the complaint, and _____ for the cross-complaint, which is comprised of the 30 days to respond under Government Code § 68616(b), and the 30 days permitted by Code of Civil Procedure section 1054(a), good cause having been found by the Civil Supervising Judge due to the case management benefits provided by this Stipulation. A copy of the General Order can be found at www.lacourt.org under "Civil", click on "General Information", then click on "Voluntary Efficient Litigation Stipulations".
(INSERT DATE) (INSERT DATE)
 3. The parties will prepare a joint report titled "Joint Status Report Pursuant to Initial Conference and Early Organizational Meeting Stipulation, and if desired, a proposed order summarizing results of their meet and confer and advising the Court of any way it may assist the parties' efficient conduct or resolution of the case. The parties shall attach the Joint Status Report to the Case Management Conference statement, and file the documents when the CMC statement is due.
 4. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day

The following parties stipulate:

Date: _____ <small>(TYPE OR PRINT NAME)</small>	➤	_____
		<small>(ATTORNEY FOR PLAINTIFF)</small>
Date: _____ <small>(TYPE OR PRINT NAME)</small>	➤	_____
		<small>(ATTORNEY FOR DEFENDANT)</small>
Date: _____ <small>(TYPE OR PRINT NAME)</small>	➤	_____
		<small>(ATTORNEY FOR DEFENDANT)</small>
Date: _____ <small>(TYPE OR PRINT NAME)</small>	➤	_____
		<small>(ATTORNEY FOR DEFENDANT)</small>
Date: _____ <small>(TYPE OR PRINT NAME)</small>	➤	_____
		<small>(ATTORNEY FOR _____)</small>
Date: _____ <small>(TYPE OR PRINT NAME)</small>	➤	_____
		<small>(ATTORNEY FOR _____)</small>
Date: _____ <small>(TYPE OR PRINT NAME)</small>	➤	_____
		<small>(ATTORNEY FOR _____)</small>

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: _____ FAX NO. (Optional): _____ E-MAIL ADDRESS (Optional): _____ ATTORNEY FOR (Name): _____		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		
STIPULATION – DISCOVERY RESOLUTION		CASE NUMBER:

This stipulation is intended to provide a fast and informal resolution of discovery issues through limited paperwork and an informal conference with the Court to aid in the resolution of the issues.

The parties agree that:

1. Prior to the discovery cut-off in this action, no discovery motion shall be filed or heard unless the moving party first makes a written request for an Informal Discovery Conference pursuant to the terms of this stipulation.
2. At the Informal Discovery Conference the Court will consider the dispute presented by parties and determine whether it can be resolved informally. Nothing set forth herein will preclude a party from making a record at the conclusion of an Informal Discovery Conference, either orally or in writing.
3. Following a reasonable and good faith attempt at an informal resolution of each issue to be presented, a party may request an Informal Discovery Conference pursuant to the following procedures:
 - a. The party requesting the Informal Discovery Conference will:
 - i. File a Request for Informal Discovery Conference with the clerk's office on the approved form (copy attached) and deliver a courtesy, conformed copy to the assigned department;
 - ii. Include a brief summary of the dispute and specify the relief requested; and
 - iii. Serve the opposing party pursuant to any authorized or agreed method of service that ensures that the opposing party receives the Request for Informal Discovery Conference no later than the next court day following the filing.
 - b. Any Answer to a Request for Informal Discovery Conference must:
 - i. Also be filed on the approved form (copy attached);
 - ii. Include a brief summary of why the requested relief should be denied;

- iii. Be filed within two (2) court days of receipt of the Request; and
 - iv. Be served on the opposing party pursuant to any authorized or agreed upon method of service that ensures that the opposing party receives the Answer no later than the next court day following the filing:
- c. No other pleadings, including but not limited to exhibits, declarations, or attachments, will be accepted.
- d. If the Court has not granted or denied the Request for Informal Discovery Conference within ten (10) days following the filing of the Request, then it shall be deemed to have been denied. If the Court acts on the Request, the parties will be notified whether the Request for Informal Discovery Conference has been granted or denied and, if granted, the date and time of the Informal Discovery Conference, which must be within twenty (20) days of the filing of the Request for Informal Discovery Conference.
- e. If the conference is not held within twenty (20) days of the filing of the Request for Informal Discovery Conference, unless extended by agreement of the parties and the Court, then the Request for the Informal Discovery Conference shall be deemed to have been denied at that time.
4. If (a) the Court has denied a conference or (b) one of the time deadlines above has expired without the Court having acted or (c) the Informal Discovery Conference is concluded without resolving the dispute, then a party may file a discovery motion to address unresolved issues.
5. The parties hereby further agree that the time for making a motion to compel or other discovery motion is tolled from the date of filing of the Request for Informal Discovery Conference until (a) the request is denied or deemed denied or (b) twenty (20) days after the filing of the Request for Informal Discovery Conference, whichever is earlier, unless extended by Order of the Court.
- It is the understanding and intent of the parties that this stipulation shall, for each discovery dispute to which it applies, constitute a writing memorializing a "specific later date to which the propounding [or demanding or requesting] party and the responding party have agreed in writing," within the meaning of Code Civil Procedure sections 2030.300(c), 2031.320(c), and 2033.290(c).
6. Nothing herein will preclude any party from applying *ex parte* for appropriate relief, including an order shortening time for a motion to be heard concerning discovery.
7. Any party may terminate this stipulation by giving twenty-one (21) days notice of intent to terminate the stipulation.
8. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day.

SHORT TITLE:	CASE NUMBER:
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The following parties stipulate:

Date: _____ (TYPE OR PRINT NAME)	➤	_____ (ATTORNEY FOR PLAINTIFF)
Date: _____ (TYPE OR PRINT NAME)	➤	_____ (ATTORNEY FOR DEFENDANT)
Date: _____ (TYPE OR PRINT NAME)	➤	_____ (ATTORNEY FOR DEFENDANT)
Date: _____ (TYPE OR PRINT NAME)	➤	_____ (ATTORNEY FOR DEFENDANT)
Date: _____ (TYPE OR PRINT NAME)	➤	_____ (ATTORNEY FOR _____)
Date: _____ (TYPE OR PRINT NAME)	➤	_____ (ATTORNEY FOR _____)
Date: _____ (TYPE OR PRINT NAME)	➤	_____ (ATTORNEY FOR _____)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: _____ FAX NO. (Optional): _____ E-MAIL ADDRESS (Optional): _____ ATTORNEY FOR (Name): _____		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		
INFORMAL DISCOVERY CONFERENCE (pursuant to the Discovery Resolution Stipulation of the parties)		CASE NUMBER:

1. This document relates to:
 - Request for Informal Discovery Conference
 - Answer to Request for Informal Discovery Conference
2. Deadline for Court to decide on Request: _____ (insert date 10 calendar days following filing of the Request).
3. Deadline for Court to hold Informal Discovery Conference: _____ (insert date 20 calendar days following filing of the Request).
4. For a Request for Informal Discovery Conference, **briefly** describe the nature of the discovery dispute, including the facts and legal arguments at issue. For an Answer to Request for Informal Discovery Conference, **briefly** describe why the Court should deny the requested discovery, including the facts and legal arguments at issue.

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: _____ FAX NO. (Optional): _____ E-MAIL ADDRESS (Optional): _____ ATTORNEY FOR (Name): _____		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		CASE NUMBER:
STIPULATION AND ORDER – MOTIONS IN LIMINE		

This stipulation is intended to provide fast and informal resolution of evidentiary issues through diligent efforts to define and discuss such issues and limit paperwork.

The parties agree that:

1. At least ____ days before the final status conference, each party will provide all other parties with a list containing a one paragraph explanation of each proposed motion in limine. Each one paragraph explanation must identify the substance of a single proposed motion in limine and the grounds for the proposed motion.
2. The parties thereafter will meet and confer, either in person or via teleconference or videoconference, concerning all proposed motions in limine. In that meet and confer, the parties will determine:
 - a. Whether the parties can stipulate to any of the proposed motions. If the parties so stipulate, they may file a stipulation and proposed order with the Court.
 - b. Whether any of the proposed motions can be briefed and submitted by means of a short joint statement of issues. For each motion which can be addressed by a short joint statement of issues, a short joint statement of issues must be filed with the Court 10 days prior to the final status conference. Each side's portion of the short joint statement of issues may not exceed three pages. The parties will meet and confer to agree on a date and manner for exchanging the parties' respective portions of the short joint statement of issues and the process for filing the short joint statement of issues.
3. All proposed motions in limine that are not either the subject of a stipulation or briefed via a short joint statement of issues will be briefed and filed in accordance with the California Rules of Court and the Los Angeles Superior Court Rules.

SHORT TITLE:	CASE NUMBER:
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The following parties stipulate:

Date:	_____	>	_____
	(TYPE OR PRINT NAME)		(ATTORNEY FOR PLAINTIFF)
Date:	_____	>	_____
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:	_____	>	_____
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:	_____	>	_____
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:	_____	>	_____
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:	_____	>	_____
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:	_____	>	_____
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)

THE COURT SO ORDERS.

Date:	_____	_____
		JUDICIAL OFFICER

FILED
LOS ANGELES SUPERIOR COURT

MAY 11 2011

JOHN A. CLARKE, CLERK
N. Navarro
BY NANCY NAVARRO, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

General Order Re)	ORDER PURSUANT TO CCP 1054(a),
Use of Voluntary Efficient Litigation)	EXTENDING TIME TO RESPOND BY
Stipulations)	30 DAYS WHEN PARTIES AGREE
)	TO EARLY ORGANIZATIONAL
)	MEETING STIPULATION

Whereas the Los Angeles Superior Court and the Executive Committee of the Litigation Section of the Los Angeles County Bar Association have cooperated in drafting "Voluntary Efficient Litigation Stipulations" and in proposing the stipulations for use in general jurisdiction civil litigation in Los Angeles County;

Whereas the Los Angeles County Bar Association Litigation Section; the Los Angeles County Bar Association Labor and Employment Law Section; the Consumer Attorneys Association of Los Angeles; the Association of Southern California Defense Counsel; the Association of Business Trial Lawyers of Los Angeles; and the California Employment Lawyers Association all "endorse the goal of promoting efficiency in litigation, and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases;"

1 Whereas the Early Organizational Meeting Stipulation is intended to encourage
2 cooperation among the parties at an early stage in litigation in order to achieve
3 litigation efficiencies;

4 Whereas it is intended that use of the Early Organizational Meeting Stipulation
5 will promote economic case resolution and judicial efficiency;

6 Whereas, in order to promote a meaningful discussion of pleading issues at the
7 Early Organizational Meeting and potentially to reduce the need for motions to
8 challenge the pleadings, it is necessary to allow additional time to conduct the Early
9 Organizational Meeting before the time to respond to a complaint or cross complaint
10 has expired;

11 Whereas Code of Civil Procedure section 1054(a) allows a judge of the court in
12 which an action is pending to extend for not more than 30 days the time to respond to
13 a pleading "upon good cause shown";

14 Now, therefore, this Court hereby finds that there is good cause to extend for 30
15 days the time to respond to a complaint or to a cross complaint in any action in which
16 the parties have entered into the Early Organizational Meeting Stipulation. This finding
17 of good cause is based on the anticipated judicial efficiency and benefits of economic
18 case resolution that the Early Organizational Meeting Stipulation is intended to
19 promote.

20 IT IS HEREBY ORDERED that, in any case in which the parties have entered
21 into an Early Organizational Meeting Stipulation, the time for a defending party to
22 respond to a complaint or cross complaint shall be extended by the 30 days permitted
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1 by Code of Civil Procedure section 1054(a) without further need of a specific court
2 order.

3
4 DATED:

May 11, 2011

Carolyn B. Kuhl

Carolyn B. Kuhl, Supervising Judge of the
Civil Departments, Los Angeles Superior Court