Judge Whitehill's Guidelines
May 28, 2026

> *The proper objective of rules of civil procedure is to obtain a just, fair, equitable and impartial adjudication of the rights of litigants under established principles of substantive law. To the end that this objective may be attained with as great expedition and dispatch and at the least expense both to the litigants and to the state as may be practicable, these rules shall be given a liberal construction.*

TEX. R. CIV. P. 1.

Judicial Philosophy

Business disputes require economic and efficient business solutions. This court's approach is to promote party autonomy during the process—with active judicial decision making when needed.

Every case has unique issues and requirements. However, the court provides these *guidelines* so the parties will know from the outset the court's expectations. This transparency will help parties make realistic planning, staffing, and budgeting decisions on the front-end and avoid delays and waste as the case progresses.

Parties should expect the court to follow these guidelines considering each case's unique issues and characteristics. Parties should also follow the court's local rules (BCLR) at www.txcourts.gov/media/1459346/local-rules-of-the-business-court-of-texas.pdf.

The rule of law, predictability, and consistency are critical to the proper administration of justice. The public is best served when cases are decided on their substantive merits. So, the court's job is to correctly decide issues by applying existing law to facts proven by admissible evidence, while ensuring that the parties have a fair opportunity to develop and present their cases.

The court's legal rulings will be based on the text of governing statutes, judicial decisions, recognized common law and equity principles, applicable procedural rules, and standard document and statutory construction rules.

Professionalism

The court respects zealous advocacy but expects parties and their counsel to follow the Texas Rules of Professional Conduct, The Texas Lawyer's Creed, and *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D.284 (N.D. Tex. 1988) (en banc). Valuable judicial, legal, and client resources are wasted when counsel or their clients do not follow these standards.

The court requires utmost candor from parties and counsel. The court expects legal statements to be supported by authorities that fairly support the offered legal principle. Likewise, the court expects factual statements to be supported by specific record citations. The court will carefully read important authorities and check the important record cites. The court will also conduct independent legal research as needed.

Early Management and Accessibility

1. Focus

Most cases turn on a few key-pivotal issues and a handful of important documents. The court encourages the parties to identify and focus on those issues and documents as soon as possible.

2. AI Notetakers

The court does not allow AI notetakers to join virtual conferences.

3. Planning Conferences

Creating a case specific discovery plan and scheduling order is important for an efficient and effective trial plan. Thus, the court intends to conduct an in-person planning conference within thirty days after the first defendant appears by answer, special appearance, removal, or other procedure. During that conference, the court and the parties will develop a plan with a goal to try the case within a year of the signed scheduling order date. The court treats that conference as the beginning of an ongoing pre-trial conference. *See* TEX. R. CIV. P. 166.

The parties are to attend the planning conference in person, to the extent possible, with counsel and a responsible client representative.

The court expects the parties to meet before the planning conference and discuss their expected document production plans, including ESI plans, and identify potential deponents. Specifically, as to ESI, the court expects the parties to have discussed their plans for searching and producing ESI (including search terms, databases, protocols, and other methodologies). *See* TEX. R. CIV. P. 190.5.

Unlike the Federal Rules, these Guidelines do not impose specific deadlines regarding when before the planning conference the parties must provide the court with their report and proposed scheduling order to the court. However, providing the court with that document at least three business days before the planning conference will facilitate a more productive conference.

The parties will find a Planning Conference Report, Discovery Control Plan, and Scheduling Order template at www.txcourts.gov/businesscourt/divisions/first/. The court expects the parties to discuss any desired modifications to the otherwise applicable discovery control plan and jointly complete the scheduling order before the planning conference. At the planning conference, the court will resolve any unresolved control plan or scheduling order issues. The court will sign the scheduling order at or before the planning conference or soon afterwards. The court will conduct the planning conference even if the parties agree to the scheduling order before the conference.

The parties may later modify the control plan or scheduling order to meet their needs except for the dispositive motion cutoff and the trial date. The dispositive motion deadline needs to be set far enough before the trial date that the court has time to decide the motions, write an opinion, and give the parties time to adjust their trial plans accordingly.

The parties will also find protective order and ESI order templates on the First Division's webpage. The parties may use as much of these templates they wish, or they may draft their own agreed orders if they prefer. The court expects the parties to complete these orders before the planning conference. The court will resolve any unresolved protective/ESI order issues during the conference.

See BCLR 4(a), as modified above.

4. Early Identification of Legal Issues

To assist in resolving the case, at any point following the initial planning conference the court or the parties may identify legal matters for the court to decide. TEX. R. CIV. P. 166(g). The parties' Scheduling Order includes a deadline for the "Early Identification of Legal Issues." These are intended to be pure legal issues the court can decide as a matter of law and that may substantially affect the case's scope.

Parties are encouraged to identify such issues before or within 35 days of the initial planning conference. The court prefers joint submissions but does not require them. This deadline is only to identify such issues, not to brief them. The parties may decide a briefing schedule for any issues they wish to brief, or the court might order briefing *sua sponte* upon reviewing the parties' lists, pleadings, or other filings. Submitting a 166(g) motion does not preclude a party from alternatively moving for summary judgment on any issue they believe appropriate.

Absent a court order, a pending 166(g) motion does not relieve a party from complying with discovery that the motion's result may affect.

5. Flowcharts

Within thirty days after the scheduling order is signed, the court asks the parties to informally submit a flowchart or outline mapping what the jury charge or findings and conclusions should be based on the existing pleadings. The parties are expected to update their submissions as causes of action or defenses are added or dismissed. These are not formal documents and should be emailed to the court, not filed. The court prefers joint submissions but does not require them. The court will accept a jury charge outline or other graphic map instead if the parties cannot produce a flowchart.

6. Status Conferences

The court will schedule brief conference calls every two or three months to discuss the parties' progress and address any issues that threaten to impair the trial date. The goal is to identify and resolve issues that might impair the trial date.

7. General Accessibility

The court is available to address simple issues, like agreed extensions or unopposed motions, by email exchange involving all counsel and the court's staff.

All emails to the court should include the case number and the first plaintiff and the first defendant in the subject line. The parties must create a single email list that they and the court will use when communicating by email. All emails involving the court must be through the Court Manager and the Staff Lawyer and include all counsel of record.

The parties should attempt to resolve issues themselves before involving the court. If court involvement is needed, upon any party's request the court will schedule as soon as practical an in person or video conference to address emerging issues. The goal is to address issues before they mature into motions. The court may initiate conference calls on short notice should it appear to the court that judicial intervention may help resolve issues before the court.

8. Informal Agreements

Parties should notify the court as soon as practical of any informal agreements made between parties that may modify these guidelines or alter the court's expected case timeline, such as extensions to file an answer or otherwise appear.

9. Amended Pleadings

When filing an amended pleading, parties should email the court a redline comparison between the amended and previously pending pleading.

10. Court Reporters

The court will schedule a court reporter for all trials and hearings on dispositive motions. For all other hearings and conferences, the parties should notify the court whether they request a court reporter.

Discovery Disputes and Motion Practice

11. Document Requests

Modern document production in complex business cases involves electronic database searches. Each party is expected to explain to the opponent(s) prior to the planning conference what the producing party proposes to do for a preliminary electronic document production search. The proposal will include initial proposed search terms, databases, and parameters. The parties are expected to discuss these variables in good faith.

The court expects written document requests to be specific and targeted. Document requests that ask for, "All documents that record, reflect, or relate to X" tend to create unnecessary discovery motions. Boiler plate objections should be avoided. Objections need to comply with the rules. *See* TEX. R. CIV. P. 193.2(e).

12. Disclosures and Interrogatory Answers

The court expects initial disclosures and interrogatory answers to be prompt, full, and complete. Parties should expect that their ability to discuss and offer evidence about issues or contentions will be better received the more complete their written responses are. *See* TEX. R. CIV. P. 193.6(a).

13. Discovery Disputes

The court expects counsel to meaningfully cooperate with each other to avoid discovery disputes. When a disagreement arises, counsel with authority to agree to solutions must actually communicate with each other in good faith to resolve their dispute before involving judicial resources. The court's experience is that most disputes can be resolved when parties discuss what they really want and what the opponent can reasonably provide.

If parties cannot resolve their differences, the court will conduct a brief video or phone conference to suggest non-binding guidance. In all instances, parties must actually confer about an issue before seeking the court's guidance. In requesting the court's

guidance, the requestion party may provide a very short—about one paragraph—description of the issue. The parties should not engage in lengthy letter writing or email correspondence with the court before the informal conference.

If the parties do not resolve their differences after that informal conference, within seven days thereafter the complaining party may submit a letter discussing the issue(s). The opposing party may submit within seven days thereafter a response. The letter submissions should be brief and simply provide a high-level overview of the issue(s) and include citations to cases believed to be dispositive. After reviewing both submissions, the court will provide its guidance.

If that guidance does not resolve the issue(s), the complaining party may then file a motion addressing only the remaining issues. The court will then notify the parties whether a hearing is needed for the court to rule on the dispute(s). *See* BCLR 4(d) (The court conference is a chamber specific modification to the court's local rules.).

These procedures do not apply to motions to quash depositions pursuant to TEX. R. CIV. P. 199.4 filed within three business days of the served deposition notice. *See* BCLR 4(c). As soon as practical thereafter, the court expects the parties to complete these informal procedures.

See BCLR 4(d) and 5 regarding the length of pre-motion letters and motion filings. This chamber permits short replies, but the court may rule any time after a response is filed.

Pre-Trial Motion Practice

14. Court Copies

Unless the court notifies the parties otherwise, it will rely on electronic copies of filings and related records when considering motions. Thus, absent a specific court request, parties need not submit paper copies, motions, responses, briefs, authorities, or appendices.

15. Dispositive Motions (*e.g.*, Summary Judgment, 166(g), and Motion to Dismiss)

The scheduling order will set dispositive motion deadlines far enough before the trial date that the motions can be submitted, the court can issue an order, and counsel will be able to adjust their trial plans accordingly. If not set by the scheduling order, and unless a statute or rule requires otherwise (*e.g.*, TEX. R. CIV. P. 91a and 166a), responses should be filed no later than fourteen days after a dispositive motion is filed. Replies should be filed no later than seven days after responses are filed.

When requesting hearings on motions pursuant to TEX. R. CIV. P. 91a or 166a, parties should be aware of the deadlines imposed on the court to timely resolve such motions under Rule 91a.3 and TEX. GOV. CODE § 23.303.

The parties should treat motions to strike an expert in whole or in part as a dispositive motion.

16. Special Appearances

Within a week after a defendant files a special appearance, the parties are expected to confer and propose a joint plan for resolving the challenge. The plan should include timelines for conducting discovery and filing oppositions and replies. Parties should contact the court for a hearing, if requested. The court allows tailored jurisdictional discovery.

The court will review the plan and decide whether a hearing or conference call is necessary to implement a schedule for resolving the special appearance. Filing a special appearance should not delay the planning conference, but the special appearance may affect the scheduling order.

17. Special Exceptions

It is incumbent on the party filing special exceptions to seek a hearing. The non-moving party shall file any response at least seven days before any related hearing.

Amending a pleading that is specially excepted to moots the special exception. However, the parties may jointly stipulate that they wish the for the hearing date to remain and that the original motion may be deemed as filed as to the amended pleading.

18. Miscellaneous Motions

Unless a statute or procedural rule requires otherwise, responses to contested, non-dispositive or expert motions should be filed no later than ten days after a contested, non-dispositive or expert motion is filed. Replies should be filed no later than seven days after the response.

Upon filing a TEX. R. CIV. P. 199.4 motion to quash depositions, the movant must tell the court whether the motion needs to be set for hearing, or if the parties are in the process of resolving the dispute. If the motion needs to be heard, the parties should confer to propose accelerated briefing deadlines and hearing date.

See BCLR 5 regarding motion practice for further guidance regarding contested, non-dispositive motions.

19. Motions to Seal

Parties should not assume that motions to seal will be granted as a matter of right. *Before seeking to file papers under seal, parties should consider whether reliance on a redacted,*

public copy of the paper is sufficient for the court or factfinder to decide contested issues. Parties should confer, where possible, to agree on redacted, public copies.

Motions for temporary sealing orders should not be filed as a matter of course and should only be used where there is the possibility of immediate and irreparable injury to a specific interest of the applicant before notice of hearing can be posted and a hearing on a motion to seal can be held. *See* TRCP 76a(5).

Along with a motion for permanent sealing order, parties must file, to the extent practical, a public, redacted copy of all papers for which sealing is requested. A slip sheet may be substituted for a paper that cannot practically be redacted for public filing. Slip sheets should contain "Subject to Motion to Seal" as part of the caption.[1] At the same time or shortly after filing a copy of the notice with the court, the movant should send (not file) the court unredacted copies of the papers for which sealing is being sought for *in camera* review ahead of the hearing.

Unless the court has granted a temporary sealing order, the court's practice is to not set a sealing motion for permanent sealing for hearing until it is necessary to prepare a final record. At that time, all relevant pending motions to seal will be heard together. It is incumbent on the parties to keep track of which documents have been submitted *in camera* to the court and require sealing to complete the formal record.

If a hearing is to be set, parties should confer regarding dates for a public hearing not less than fourteen days *after notice may be posted*. *See* TRCP 76a(3). The movant should contact the court to receive a date for the public hearing. The movant must give public notice of the hearing and file a verified copy of the posted notice with the clerk of the court pursuant to Rule 76a(3). The court will issue an order following the hearing on the motion. If the motion is granted, the movant will be given leave to file unredacted copies of the papers under seal in the record with the clerk of the court. If the motion is denied, the *in camera* copies of the papers will be destroyed and not made public.

See BCLR 9.

Notwithstanding the above, the sealing of documents containing alleged trade secrets is governed by CIV. PRAC. & REM. CODE § 134A.0065 (Effective Sept. 1, 2025).

20. Proposed Orders

Parties should email a *Word* version of all proposed orders to the court.

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[1] Parties should not mark these versions of the documents as "contains sensitive information" on eFile. Redacted/slipsheeted documents are intended to be public versions of otherwise confidential documents.

21. Hearings

Parties are to file their motions and then request a hearing.

In their papers or by email as soon as practicable, the parties will advise the court whether they want oral argument and how much time they think is needed, or if they consent to setting the motion for submission on the papers. The opposing side will respond with their preferences. The court will advise whether it will hold oral arguments and, if granted, when they will be held and how much time will be allowed. Parties are to discuss and propose an expected amount of time needed for a particular hearing before contacting the Court Manager. The court's default is to allow each side 25 minutes to allocate however they wish.

The court will conduct as many oral arguments as possible in person in the court's hearing room or at the Robert H. Dedman SMU School of Law.

The court expects counsel to start hearings on time, and parties should arrive early enough to do so. The parties should expect hearings to last no longer than their allotted times.

22. Briefs

All briefs or related submissions should comply with BCLR 5 regarding word limits and any other formatting requirements. However, this chamber prefers fourteen-point Century Schoolbook or a similar serifed font. All submissions of ten pages or more should include a table of contents, table of authorities, and consider including a table of abbreviations and defined terms. And they should use Arabic numbers throughout, beginning with the title page.

Each page should contain a footer with the document title or an abbreviated version of the document. The court uses Westlaw, so parties who utilize Lexis or other platforms should include Westlaw citations for unreported cases.

Additionally, parties should use the Business Court's medium neutral citations when citing those decisions.

23. Appendices

See BCLR 5(d), except the court prefers exhibits or appendices to be combined as a single document—separate from the main document (or multiple volumes where necessary to comply with upload size limitations).[2] Appendices should include a footer, as detailed

[2] eFile Texas currently supports uploads sizes of around 36 MB.

below, beginning on the document's first page so that document page numbers match .pdf page numbers for easier viewing.

The bottom of each appendix page should be marked as follows: X's Appendix to [Motion Short Title] [Record Page #] (similar to a Bates stamp). When citing to the record, cite to the specific appendix page number for the material you are referencing (*e.g.*, X's App. 1). The appendix should have a case style as its first page and table of contents for the entire appendix.

The footer of subsequent volumes should continue with the next record page number where the party's previous appendix left off. Where multiple volumes are required, make it easy for the court to determine which record pages appear in which volumes (*e.g.*, with a chart, including the record page range of the appendix in the footer, etc.).

In all instances, the goal is to allow the court to unambiguously identify the page being cited to and locate the page quickly.

The Pre-Trial Order and Conference

24. Pre-Trial

The scheduling order should provide for a final pre-trial conference no less than fourteen days before the trial date. No less than three days before that conference, the parties will submit a proposed pre-trial order that has been agreed to in good faith as much as possible and their motions in limine (in jury trials), unless the parties' Scheduling Order sets a different deadline. The court will decide unresolved issues at the pre-trial conference. And the court also expects to consider motions in limine and document-related evidentiary issues. The parties will also submit revised charge flowcharts or outlines for discussion. At the pre-trial conference, the court will adopt expected time limits for voir dire, opening statements, evidence, closing arguments, and other trial management issues.

The court has provided pre-trial order templates on its website (for jury and non-jury trials).

Mediation

25. Choice of Mediator

Many parties want to engage in settlement discussions but are afraid to begin the process over concern they will be perceived as weak. To remove that concern, the scheduling order will include a deadline to conduct mediation.

Consistent with party autonomy, the court defers to the parties to select their own mediator and to conduct the mediation before the deadline. If the parties cannot agree to a mediator, the court may suggest several. The parties should select a mediator well before

the deadline to conduct the mediation because many mediators are booked more than a month in advance.

Trials

26. Jury Trials

The parties' Scheduling Order will identify who requests a jury and the estimated trial length. The jury fee must be paid at least eight weeks before trial to ensure a jury may be summoned. *See* TEX. R. CIV. P. 216. Closer to trial, the court will issue a Jury Fee Order, but in any circumstance, the parties must pay the jury fee on time.

The court will conduct a brief, final pre-trial conference the day trial begins to address any new or remaining issues that need to be decided before beginning the trial.

The court will conduct basic juror qualification examinations, incorporating approved topics suggested by counsel. The court expects that in most cases an additional thirty to forty minutes per party will suffice. In most cases, the court anticipates allotting ten to twenty hours per party for witness examinations and no more than twenty-five to forty-five minutes for closing arguments. However, the court will look at each case's unique circumstances when considering different time limits.

The parties are to submit formal, requested jury charges (or findings and conclusions in nonjury trials) by the first day of trial. The court will consider Texas and Fifth Circuit Pattern questions and instructions, as applicable, for guidance. The court anticipates submitting only basic instructions and definitions needed to allow the jury to understand the questions. The court discourages requesting excessive instructions that are comments on the evidence. The court emphasizes the need to avoid *Casteel* problems. Proposed jury charges should be submitted in Word format.

27. Non-jury Trials

The court expects to conduct non-jury trials in the court's hearing room or at the Robert H. Dedman SMU School of Law. Non-jury trials will conform to the time limits for opening statements, presenting evidence, and closing arguments as apply in jury trials. The court will decide whether to accept post-trial briefs in addition to or in lieu of closing arguments.

The jury charge guidelines and timetables will also apply to proposed findings and conclusions. The court expects proposed findings to follow appellate court standards. The court will not accept overly detailed findings and conclusions. Rather, proposed findings and conclusions should simulate jury charges for the subject causes of action and affirmative defenses. Proposed findings and conclusions should be submitted in Word format.

28. Objections

The court expects parties to make non-speaking objections. An objecting party should state the nature of the objection and a supporting rule. Non-objecting parties should not respond unless the court requests a response.

Settlements

29. Settlement Documents

The court expects parties to promptly submit appropriate agreed orders documenting their settlements. The court will presume the parties desire a dismissal with prejudice and may enter the same without further notice if the parties do not submit final dispositive orders within thirty days after announcing settlement.

Legal Writing Tips

30. Suggestions for Better Briefs

Following these suggestions will improve your chances of the court understanding your writings:

- Write with the judge's perspective in mind. It is your job to make it easy for the court to understand your arguments.

- Get to the point.

- Understand that the court is busy and every case before it is important, your case included. Similarly, every case on the docket is important to those parties too. The court will be fair, impartial, and efficient with all of them.

- Although you are familiar with your case, it may take the court a while to become familiar with it also.

- Start with your requested relief. Tell the court the precise relief you want and where the court can find the supporting evidence.

- Identify and focus on the critical issues. Tell the court what those issues are upfront. Use "deep issues" to educate the court about those issues and why your party should prevail on that issue.

- Understand that "Brevity is the soul of wit." (*Hamlet* Act 2, scene 2, 86-92). Every word the court reads is work.

- Follow Occam's Razor.

- Avoid hyperbole. “Punching it up” is distracting, counterproductive, and annoying.
- Use complete topic sentences: a premise and supporting rationale.
- Be well-structured using classic outlining principles.
- Use headings and sub-headings.
- Connect thoughts with threading principles.
- Be fair and accurate with the facts as you in good faith understand them.
- Understand that syntax matters. Sentences flow best downhill.
- Avoid “ly” adverbs; use power verbs instead. Saying that a case, document, or testimony “clearly” says something does not make that point clearer than it is based on a plain reading.
- A picture is worth a thousand words. Include pictures, document excerpts, and charts as appropriate.
- Beware the multiple personal pronouns.
- BEWARE OF ALL CAPS. USING ALL CAPS SCREAMS AT ME, DOES NOT ADD CLARITY, AND MAKES THE WRITING HARD TO READ. THE COURT WILL READ WHAT YOU SAY WITHOUT THEM.
- Beware the “over-bold” and “over-italics.”
- Avoid clutter. Remove unnecessary words, especially unnecessary prepositional phrases.
- Do not use string cites for non-controversial legal points.
- Put record citations in footnotes, and legal citations in text. Don’t use “Id.” in record cites.
- Put all evidence in a separate, single appendix with pages numbered consecutively from one to the end.
- Responses and replies should remind the court of the point being addressed and then address that point.

1B Procedural Quick Reference

Communication	Include the Court Manager, the Staff Attorney, and all parties or their attorneys on email communications. Emails to the court should include the case number and the first plaintiff and the first defendant in the subject line.
Informal Agreements	Parties should notify the court of any informal agreements that modify these guidelines or alter the court's expected case timeline.
Initial Scheduling Conference	A planning conference will be held within 30 days after the first defendant appears. At least 3 business days ahead of the conference, parties should file a proposed Scheduling Order and Protective Order. Contact the Court Manager for a trial date.
Flowcharts	Within 30 days after a Scheduling Order is entered, email the court a flowchart or outline mapping what the jury charge or findings and conclusions should be based on the existing pleadings.
Discovery Disputes	*See* BCLR 4(d), as modified below. ***Preliminary.*** Counsel with authority to bind their client(s) must communicate and attempt to resolve the dispute. ***Phone conference.*** Contact the Court Manager to schedule a brief phone conference. The court will suggest non-binding guidance. ***Letters.*** Thereafter, the complaining party may submit a letter within 7 days of the conference. The opposing party may submit a response within 7 days thereafter. The court will provide guidance. ***Motions.*** If the issue is not resolved, complaining party may file a motion. The court will decide whether a hearing is needed.
Dispositive Motions	***Deadlines.*** Unless set by the Scheduling Order or otherwise provided, responses must be filed no later than 14 days after a motion is filed. Replies must be filed not later than 7 days after responses are filed. ***Expert Motions.*** Motions to strike an expert in whole or in part are treated as dispositive motions.
Special Appearances	Within 1 week of filing a special appearance, parties should confer and present to the court a proposed plan for resolving the challenge.
Non-Dispositive Motions	Unless otherwise provided, responses must be filed no later than 10 days after a motion is filed. Replies must be filed not later than 7 days after responses are filed.
Motions to Seal	***Preliminary.*** Effort should be made to agree on public, redacted versions of documents before seeking sealing. ***Motion.*** File public, redacted copies of all documents sought to be filed permanently under seal. Slip sheets stating "Subject to Motion to Seal" are permitted in cases where redacting is impractical.

Rev. 5/28/26

1B Procedural Quick Reference

	Notice. Contact the Court Manager to request a hearing date that affords giving notice to the public. Notice must be posted and filed with the court pursuant to TRCP 76a(3) 14 days before the hearing. ***In camera review.*** Email unredacted copies of documents to the court. ***Temporary Orders discouraged.*** Motions for temporary sealing orders should be filed only as needed and not as a matter of course. ***Trade Secrets.*** *See* CIV. PRAC. & REM. CODE § 134A.0065 (Eff. 9/1/25).
Proposed Orders	Email the court a Word version of all proposed orders.
Hearings	Request oral argument as soon as practicable after the motion is filed. Contact the Court Manager to request a hearing date, providing anticipated length of time needed. Notice must be provided under TRCP 21(b).
Word Limits and Formatting	All briefs or motions should comply with BCLR 5 regarding word limits and formatting requirements, except: (1) the court prefers 14-pt Century Schoolbook or a similar serifed font; (2) all submissions of 10 pages or more should include tables of contents, authorities, and abbreviations and defined terms; and (3) all submissions should be numbered with only Arabic numbers that begin on the document's first page such that document page numbers and PDF page numbers should match.
Appendices	Exhibits should be combined into a single appendix, separate to the main document (or multiple volumes where necessary to comply with upload size limitations). Appendices should contain a footer similar to a Bates stamp and be continuously numbered starting from the first page. Record citations should be to the specific appendix page number being referenced (*e.g.*, X's App'x 1). Subsequent volumes should continue the page numbering from the previous volume and make it easy for the court to determine which record pages appear in which volumes.
Trial	***Pretrial conference.*** The initial conference is to occur no less than 14 days before trial. A final pretrial conference will be conducted on the date of trial before commencement of trial. ***Conference requirements.*** No less than 3 days before the pre-trial conference, parties must submit (1) a proposed pretrial order, (2) motions in limine, and (3) any revisions to flowcharts/outlines. Word versions of proposed orders or informal submissions should be emailed to the court. ***Jury charges.*** Parties must submit formal, requested jury charges or findings and conclusions by the first day of trial. Email Word versions to the court.