



**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS**

Friday, May 8, 2020

TRIAL DIVISION – CIVIL

NOTICE TO THE BAR

**PROTOCOL FOR AGREED UPON ORDER FOR
EXTRAORDINARY RELIEF DURING COVID-19 JUDICIAL EMERGENCY
(MAJOR JURY, COMMERCE, NON-JURY AND ARBITRATION APPEALS PROGRAMS)**

In light of the ongoing impediments to discovery created by the COVID-19 pandemic which are beyond the control of the Court, members of the bar and litigants, the Office of Judicial Records shall enter appropriate relief for parties including necessary discovery extensions in cases where there is agreement among the parties consistent with this protocol. Recognizing that no party should gain an advantage as a result of the pending judicial emergency and that appropriate equitable considerations must be applied so that matters proceed in a fair and just manner, the Court has adopted the following protocol for extraordinary relief of a case management deadline or deadlines where all parties consent.

Under this protocol no Discovery deadline shall extend beyond September 8, 2020. Any Case Management Order in which the Discovery deadline ends subsequent to March 1, 2020 may, by this protocol, extend the discovery deadline (thereby resetting all subsequent deadlines) until July 6, 2020, August 3, 2020 or September 8, 2020 by filing one of the attached Praecipes. **No Date May Be Changed Within The Praecipe.** Under this protocol, no expired Discovery deadline shall extend beyond September 8, 2020.

If a Motion for Extraordinary Relief has previously been filed, Counsel may file the Praecipe as a response to the Motion. The Control Number of the Motion must be in the caption of the Praecipe.

This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

PROTOCOL FOR EXTRAORDINARY RELIEF BY CONSENT OF ALL PARTIES

The parties shall proceed with the filing of one of the attached **Praeceptum for Agreed Upon Order for Extraordinary Relief**. There is a presumption of good cause for any Praeceptum for Extraordinary Relief which complies with these terms. Consistent with this presumption of good cause, the Office of Judicial Records shall enter the agreed upon order filed pursuant to this protocol provided that such Praeceptum complies with the terms of this protocol and is consistent with the terms of the attached form. The parties shall maintain written confirmation as to the agreement to extend deadlines.

NOTE:

Nothing in this Protocol limits the ability of the parties to jointly or individually seek additional relief from case management deadlines by way of traditional motion practice once the judicial emergency has ended. Further, nothing in this Protocol limits the ability of any party upon expiration of the agreed-upon extended deadlines to unilaterally seek additional relief from any and all deadlines by way of appropriate motion or otherwise. Nothing in this Protocol prevents a party from filing a traditional Motion for Extraordinary Relief where there is not unanimous consent under this protocol.

Honorable Jacqueline F. Allen
Administrative Judge
Trial Division

Honorable Arnold L. New
Supervising Judge
Trial Division – Civil

Honorable Gary S. Glazer
Supervising Judge
Trial Division - Commerce

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

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	:	
	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY, PA
Plaintiffs	:	
	:	
v.	:	_____ TERM, 20__
	:	
	:	NO. _____
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Defendants	:	
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**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF
FOR COMMERCE AND MAJOR JURY CASES DURING COVID-19 JUDICIAL
EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

1. All *Discovery* in the above matter shall be completed ***no later than July 6, 2020.***
2. *Plaintiff* shall identify and ***submit curriculum vitae and expert reports*** of all expert witnesses intended to testify at trial to all the parties ***no later than August 3, 2020.***
3. *Defendant and any additional defendants* shall identify and ***submit curriculum vitae and expert reports*** of all expert witnesses intended to testify at trial ***no later than September 8, 2020.***

4. All *pre-trial motions*, other than motions *in limine*, shall be filed ***no later than September 8, 2020***.
5. A ***settlement conference*** may be scheduled at any time after ***October 5, 2020***.
Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following:
 - (a) A concise summary of the nature of the case;
 - (b) A statement by the plaintiff of all the damages, including an itemization of injuries and all special damages claimed by the plaintiff;
 - (c) Defendant shall identify all applicable insurance carriers, together with applicable limits of liability.
6. A ***pre-trial conference*** will be scheduled any time after ***December 7, 2020***.
Fifteen (15) days prior to pretrial conference, all counsel shall serve all opposing counsel and file a pretrial memorandum containing the following:
 - (a) A concise summary of the nature of the case;
 - (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
 - (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
 - (d) The plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. The list shall include as appropriate, computations of all past lost earnings and future lost earnings capacity or medical expenses together with any other unliquidated damages claimed;
 - (e) Defendant shall state the position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability;

(f) Each counsel shall provide an estimate of the anticipated length of trial.

7. *It is expected that the case will be ready for trial after January 4, 2021* and counsel should anticipate trial is to begin expeditiously thereafter.

CERTIFICATION

This extension is necessary due to the extraordinary circumstances caused by the COVID-19 pandemic, which have impeded the parties' collective ability to advance this case pursuant to the currently applicable case management deadlines.

I hereby certify that I have conferred with counsel for [PARTY NAME(S)] and that all parties agree to the need for the requested extension. I make this certification subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

The parties shall maintain a written confirmation of their agreement.

Electronic signature is acceptable.

BY: _____, Esquire

Attorney for [PARTY NAME]

Date:

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

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	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY, PA
Plaintiffs	:	
	:	
v.	:	_____ TERM, 20__
	:	
	:	NO. _____
	:	
	:	
Defendants	:	
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**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF
FOR COMMERCE AND MAJOR JURY CASES DURING COVID-19 JUDICIAL
EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

1. All *Discovery* in the above matter shall be completed *no later than August 3, 2020*.
2. *Plaintiff* shall identify and *submit curriculum vitae and expert reports* of all expert witnesses intended to testify at trial to all the parties *no later than September 8, 2020*.
3. *Defendant and any additional defendants* shall identify and *submit curriculum vitae and expert reports* of all expert witnesses intended to testify at trial *no later than October 5, 2020*.

4. All *pre-trial motions*, other than motions *in limine*, shall be filed *no later than October 5, 2020*.
5. A *settlement conference* may be scheduled at any time after *November 2, 2020*.
Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following:
 - (a) A concise summary of the nature of the case;
 - (b) A statement by the plaintiff of all the damages, including an itemization of injuries and all special damages claimed by the plaintiff;
 - (c) Defendant shall identify all applicable insurance carriers, together with applicable limits of liability.
6. A *pre-trial conference* will be scheduled any time after *January 4, 2021*.
Fifteen (15) days prior to pretrial conference, all counsel shall serve all opposing counsel and file a pretrial memorandum containing the following:
 - (a) A concise summary of the nature of the case;
 - (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
 - (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
 - (d) The plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. The list shall include as appropriate, computations of all past lost earnings and future lost earnings capacity or medical expenses together with any other unliquidated damages claimed;
 - (e) Defendant shall state the position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability;

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

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Plaintiffs	:	COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA
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v.	:	_____ TERM, 20__
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	:	NO. _____
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Defendants	:	
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**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF
FOR COMMERCE AND MAJOR JURY CASES DURING COVID-19 JUDICIAL
EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

1. All *Discovery* in the above matter shall be completed ***no later than September 8, 2020.***
2. *Plaintiff* shall identify and ***submit curriculum vitae and expert reports*** of all expert witnesses intended to testify at trial to all the parties ***no later than October 5, 2020.***
3. ***Defendant and any additional defendants*** shall identify and ***submit curriculum vitae and expert reports*** of all expert witnesses intended to testify at trial ***no later than November 2, 2020.***

4. All *pre-trial motions*, other than motions *in limine*, shall be filed ***no later than November 2, 2020***.
5. A ***settlement conference*** may be scheduled at any time after ***December 7, 2020***.
Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following:
 - (a) A concise summary of the nature of the case;
 - (b) A statement by the plaintiff of all the damages, including an itemization of injuries and all special damages claimed by the plaintiff;
 - (c) Defendant shall identify all applicable insurance carriers, together with applicable limits of liability.
6. A ***pre-trial conference*** will be scheduled any time after ***February 2, 2021***.
Fifteen (15) days prior to pretrial conference, all counsel shall serve all opposing counsel and file a pretrial memorandum containing the following:
 - (a) A concise summary of the nature of the case;
 - (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
 - (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
 - (d) The plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. The list shall include as appropriate, computations of all past lost earnings and future lost earnings capacity or medical expenses together with any other unliquidated damages claimed;
 - (e) Defendant shall state the position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability;

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

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	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY, PA
Plaintiffs	:	
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v.	:	_____ TERM, 20__
	:	
	:	NO. _____
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Defendants	:	
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**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF
FOR NON-JURY TRIALS DURING COVID-19 JUDICIAL EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

The above captioned matter is hereby assigned to the **November 2020 Trial Pool** and counsel should anticipate trial to begin expeditiously thereafter. Counsel and parties will be noticed for trial to take place during the designated trial pool month. All counsel and parties must immediately notify the court of any scheduling conflicts, including trial attachment and pre-paid vacations by electronically filing a trial pool conflict letter and are under a continuing obligation to notify the court of any subsequent trial attachments during the trial pool month. The court will not recognize any untimely conflict notifications. Failure to notify Court of scheduling conflicts will result in the imposition of appropriate sanctions. To electronically file the trial pool conflict

letter, access the “Existing Case” section of the court’s electronic filing system. Select “Conference Submissions” as the filing category. Select “Trial Pool Conflict Letter” as the document type.

It is Ordered that:

1. All *discovery* in the above matter shall be completed not later than **06-JUL-2020**
2. *Plaintiff’s expert report*, if applicable, including any supplemental report, is to be served on opposing counsel and/or opposing party on or before **06-JUL-2020**.
3. *Defendant’s and any additional defendants’ expert report* is to be served on opposing counsel and/or opposing party on or before **03-AUG-2020**.
4. All *pre-trial and dispositive motions* must be filed no later than **03-AUG-2020**.
5. A mandatory *pre-trial settlement conference* will be scheduled any time after **05-OCT-2020**.

EARLIER LISTINGS WILL BE SCHEDULED AT THE DISCRETION OF THE COURT. COUNSEL MUST APPEAR AT THE MANDATORY PRE-TRIAL SETTLEMENT CONFERENCE WITH KNOWLEDGE OF THE CASE AND SETTLEMENT AUTHORITY. FAILURE TO COMPLY WITH THIS DIRECTIVE WILL RESULT IN SANCTIONS IN THE AMOUNT OF \$100.00.

Notice will be sent to all parties at least thirty (30) days in advance of the conference. Ten (10) days prior to the conference, all counsel shall serve upon all opposing counsel and/or opposing parties and file with the Court a pre-trial settlement memorandum containing the following:

- (a) A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant;
- (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
- (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre- numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
- (d) Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This

list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and

- (e) Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability; and
- (f) Each counsel shall provide an estimate of the anticipated length of trial.

FAILURE TO TIMELY FILE A PRE-TRIAL SETTLEMENT CONFERENCE MEMORANDUM MAY RESULT IN THE IMPOSITION OF MONETARY SANCTIONS.

All Motions in Limine shall be filed in accordance with electronic filing procedures not later than fifteen (15) days prior to the start of trial. Responding counsel shall have ten (10) days thereafter to file any response. For pool cases, the start of the trial is defined as the first day of the trial pool listing.

Requests to extend any case management deadline or for trial continuance must be submitted by filing a Motion for Extraordinary relief and filed prior to the expiration of the deadline in question.

Any requests for a date-certain trial listing must be submitted in writing with specificity, with a copy to opposing party, and directed to the Honorable Lisette Shirdan-Harris, Team Leader, via facsimile (215-686-5137) or US Mail (622 City Hall, Philadelphia, PA 19107). However, said requests may be made only under exigent circumstances.

Counsel should have substitute counsel prepared to conduct settlement conference and/or trial where practicable.

CERTIFICATION

This extension is necessary due to the extraordinary circumstances caused by the COVID-19 pandemic, which have impeded the parties' collective ability to advance this case pursuant to the currently applicable case management deadlines.

I hereby certify that I have conferred with counsel for [PARTY NAME(S)] and that all parties agree to the need for the requested extension. I make this certification subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

The parties shall maintain a written confirmation of their agreement.
Electronic signature is acceptable.

BY: _____

, Esquire

Attorney for [PARTY NAME]

Date:

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

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	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY, PA
Plaintiffs	:	
	:	
v.	:	_____ TERM, 20__
	:	
	:	NO. _____
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Defendants	:	
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**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF
FOR NON-JURY TRIALS DURING COVID-19 JUDICIAL EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

The above captioned matter is hereby assigned to the **December 2020 Trial Pool** and counsel should anticipate trial to begin expeditiously thereafter. Counsel and parties will be noticed for trial to take place during the designated trial pool month. All counsel and parties must immediately notify the court of any scheduling conflicts, including trial attachment and pre-paid vacations by electronically filing a trial pool conflict letter and are under a continuing obligation

to notify the court of any subsequent trial attachments during the trial pool month. The court will not recognize any untimely conflict notifications. Failure to notify Court of scheduling conflicts will result in the imposition of appropriate sanctions. To electronically file the trial pool conflict letter, access the “Existing Case” section of the court’s electronic filing system. Select “Conference Submissions” as the filing category. Select “Trial Pool Conflict Letter” as the document type.

It is Ordered that:

1. All *discovery* in the above matter shall be completed not later than **03-AUG-2020**
2. *Plaintiff’s expert report*, if applicable, including any supplemental report, is to be served on opposing counsel and/or opposing party on or before **03-AUG-2020**.
3. *Defendant’s and any additional defendants’ expert report* is to be served on opposing counsel and/or opposing party on or before **08-SEP-2020**.
4. All *pre-trial and dispositive motions* must be filed no later than **08-SEP-2020**.
5. A mandatory *pre-trial settlement conference* will be scheduled any time after **02-NOV-2020**.

EARLIER LISTINGS WILL BE SCHEDULED AT THE DISCRETION OF THE COURT. COUNSEL MUST APPEAR AT THE MANDATORY PRE-TRIAL SETTLEMENT CONFERENCE WITH KNOWLEDGE OF THE CASE AND SETTLEMENT AUTHORITY. FAILURE TO COMPLY WITH THIS DIRECTIVE WILL RESULT IN SANCTIONS IN THE AMOUNT OF \$100.00.

Notice will be sent to all parties at least thirty (30) days in advance of the conference. Ten (10) days prior to the conference, all counsel shall serve upon all opposing counsel and/or opposing parties and file with the Court a pre-trial settlement memorandum containing the following:

- (a) A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant;
- (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;

- (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
- (d) Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and
- (e) Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability; and
- (f) Each counsel shall provide an estimate of the anticipated length of trial.

FAILURE TO TIMELY FILE A PRE-TRIAL SETTLEMENT CONFERENCE MEMORANDUM MAY RESULT IN THE IMPOSITION OF MONETARY SANCTIONS.

All Motions in Limine shall be filed in accordance with electronic filing procedures not later than fifteen (15) days prior to the start of trial. Responding counsel shall have ten (10) days thereafter to file any response. For pool cases, the start of the trial is defined as the first day of the trial pool listing.

Requests to extend any case management deadline or for trial continuance must be submitted by filing a Motion for Extraordinary relief and filed prior to the expiration of the deadline in question.

Any requests for a date-certain trial listing must be submitted in writing with specificity, with a copy to opposing party, and directed to the Honorable Lisette Shirdan-Harris, Team Leader, via facsimile (215-686-5137) or US Mail (622 City Hall, Philadelphia, PA 19107). However, said requests may be made only under exigent circumstances.

Counsel should have substitute counsel prepared to conduct settlement conference and/or trial where practicable.

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

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	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY, PA
Plaintiffs	:	
	:	
v.	:	_____ TERM, 20__
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	:	NO. _____
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Defendants	:	
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**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF
FOR NON-JURY TRIALS DURING COVID-19 JUDICIAL EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

The above captioned matter is hereby assigned to the **January 2021 Trial Pool** and counsel should anticipate trial to begin expeditiously thereafter. Counsel and parties will be noticed for trial to take place during the designated trial pool month. All counsel and parties must immediately notify the court of any scheduling conflicts, including trial attachment and pre-paid vacations by electronically filing a trial pool conflict letter and are under a continuing obligation to notify the court of any subsequent trial attachments during the trial pool month. The court will not recognize any untimely conflict notifications. Failure to notify Court of scheduling conflicts will result in the imposition of appropriate sanctions. To electronically file the trial pool conflict

letter, access the “Existing Case” section of the court’s electronic filing system. Select “Conference Submissions” as the filing category. Select “Trial Pool Conflict Letter” as the document type.

It is Ordered that:

1. All *discovery* in the above matter shall be completed not later than **08-SEP-2020**
2. *Plaintiff’s expert report*, if applicable, including any supplemental report, is to be served on opposing counsel and/or opposing party on or before **08-SEP-2020**.
3. *Defendant’s and any additional defendants’ expert report* is to be served on opposing counsel and/or opposing party on or before **05-OCT-2020**.
4. All *pre-trial and dispositive motions* must be filed no later than **05-OCT-2020**.
5. A mandatory *pre-trial settlement conference* will be scheduled any time after **07-DEC-2020**.

EARLIER LISTINGS WILL BE SCHEDULED AT THE DISCRETION OF THE COURT. COUNSEL MUST APPEAR AT THE MANDATORY PRE-TRIAL SETTLEMENT CONFERENCE WITH KNOWLEDGE OF THE CASE AND SETTLEMENT AUTHORITY. FAILURE TO COMPLY WITH THIS DIRECTIVE WILL RESULT IN SANCTIONS IN THE AMOUNT OF \$100.00.

Notice will be sent to all parties at least thirty (30) days in advance of the conference. Ten (10) days prior to the conference, all counsel shall serve upon all opposing counsel and/or opposing parties and file with the Court a pre-trial settlement memorandum containing the following:

- (a) A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant;
- (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
- (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
- (d) Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate,

- computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and
- (e) Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability; and
 - (f) Each counsel shall provide an estimate of the anticipated length of trial.

FAILURE TO TIMELY FILE A PRE-TRIAL SETTLEMENT CONFERENCE MEMORANDUM MAY RESULT IN THE IMPOSITION OF MONETARY SANCTIONS.

All Motions in Limine shall be filed in accordance with electronic filing procedures not later than fifteen (15) days prior to the start of trial. Responding counsel shall have ten (10) days thereafter to file any response. For pool cases, the start of the trial is defined as the first day of the trial pool listing.

Requests to extend any case management deadline or for trial continuance must be submitted by filing a Motion for Extraordinary relief and filed prior to the expiration of the deadline in question.

Any requests for a date-certain trial listing must be submitted in writing with specificity, with a copy to opposing party, and directed to the Honorable Lisette Shirdan-Harris, Team Leader, via facsimile (215-686-5137) or US Mail (622 City Hall, Philadelphia, PA 19107). However, said requests may be made only under exigent circumstances.

Counsel should have substitute counsel prepared to conduct settlement conference and/or trial where practicable.

CERTIFICATION

This extension is necessary due to the extraordinary circumstances caused by the COVID-19 pandemic, which have impeded the parties' collective ability to advance this case pursuant to the currently applicable case management deadlines.

I hereby certify that I have conferred with counsel for [PARTY NAME(S)] and that all parties agree to the need for the requested extension. I make this certification subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

The parties shall maintain a written confirmation of their agreement.
Electronic signature is acceptable.

BY: _____

, Esquire

Attorney for [PARTY NAME]

Date:

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
 PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

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	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY, PA
Plaintiffs	:	
	:	
v.	:	_____ TERM, 20__
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	:	NO. _____
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Defendants	:	
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**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF FOR
 ARBITRATION APPEAL CASES DURING COVID-19 JUDICIAL EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

1. **ATTACHMENT:** All counsel and parties are hereby attached for the **November 2020 Trial Pool**. All parties and or counsel are Ordered to appear at a Mandatory Pre-trial Settlement Conference, which will be scheduled any time on or after **05-OCT-2020**, at **9:00 AM**, in Courtroom 622 City Hall, Philadelphia, PA 19107, and bring with them a completed settlement conference memorandum. Notice of said conference shall be sent to counsel at least 30 days in advance of the conference.
2. **Discovery Deadline:** All discovery shall be completed *no later than 06-JUL-2020*.

3. **Expert Deadline:** *Plaintiff's expert report* (if applicable), including any supplemental report, is to be served on opposing counsel and/or opposing party **on or before 06-JUL-2020**. *Defendant's expert report* is to be served on opposing counsel and/or opposing party **on or before 03-AUG-2020**.
4. **Dispositive Motions:** All dispositive motions must be filed *no later than 03-AUG-2020*.
5. **Motions in Limine:** All Motions in Limine must be filed *no later than 15 days prior to trial*. All responses must be filed *no later than 10 days thereafter*.
6. **Witnesses & Exhibits:** 15 days prior to the pre-trial settlement conference, all counsel shall serve on opposing counsel a list of all witnesses who may be called to testify at trial by name and address. Counsel should expect any witness not listed to be precluded from testifying at trial; and a list of all exhibits the party intends to offer into evidence. All exhibits should be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial.
7. **Extensions:** Requests to extend any case management deadline **must be submitted by filing a Motion for Extraordinary Relief** and filed prior to the expiration of the deadline in question.
8. **Continuances:** All requests for continuances must be submitted in writing, with a copy to opposing party, and directed to the Honorable Lisette Shirdan-Harris, Team Leader, via facsimile (215-686-5137) or U.S. Mail (622, City Hall, Philadelphia, PA 19107). **However, said request may be made only under exigent circumstances.**
9. **Jury Charge:** an agreed upon Jury Charge and an agreed upon Jury Verdict Sheet must be presented to the trial judge at the time of jury selection.

CERTIFICATION

This extension is necessary due to the extraordinary circumstances caused by the COVID-19 pandemic, which have impeded the parties' collective ability to advance this case pursuant to the currently applicable case management deadlines.

I hereby certify that I have conferred with counsel for [PARTY NAME(S)] and that all parties agree to the need for the requested extension. I make this certification subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

The parties shall maintain a written confirmation of their agreement.
Electronic signature is acceptable.

BY: _____

, Esquire

Attorney for [PARTY NAME]

Date:

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

	:	
	:	
	:	
	:	
Plaintiffs	:	COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA
	:	
v.	:	_____ TERM, 20__
	:	
	:	NO. _____
	:	
	:	
Defendants	:	
	:	
	:	

**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF FOR
ARBITRATION APPEAL CASES DURING COVID-19 JUDICIAL EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

1. **ATTACHMENT:** All counsel and parties are hereby attached for the **December 2020 Trial Pool**. All parties and or counsel are Ordered to appear at a Mandatory Pre-trial Settlement Conference, which will be scheduled any time on or after **02-NOV-2020**, at **9:00 AM**, in Courtroom 622 City Hall, Philadelphia, PA 19107, and bring with them a completed settlement conference memorandum. Notice of said conference shall be sent to counsel at least 30 days in advance of the conference.
2. **Discovery Deadline:** All discovery shall be completed *no later than 03-AUG-2020*.

3. **Expert Deadline:** *Plaintiff's expert report* (if applicable), including any supplemental report, is to be served on opposing counsel and/or opposing party **on or before 03-AUG-2020**. *Defendant's expert report* is to be served on opposing counsel and/or opposing party **on or before 08-SEP-2020**.
4. **Dispositive Motions:** All dispositive motions must be filed *no later than 08-SEP-2020*.
5. **Motions in Limine:** All Motions in Limine must be filed *no later than 15 days prior to trial*. All responses must be filed *no later than 10 days thereafter*.
6. **Witnesses & Exhibits:** 15 days prior to the pre-trial settlement conference, all counsel shall serve on opposing counsel a list of all witnesses who may be called to testify at trial by name and address. Counsel should expect any witness not listed to be precluded from testifying at trial; and a list of all exhibits the party intends to offer into evidence. All exhibits should be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial.
7. **Extensions:** Requests to extend any case management deadline **must be submitted by filing a Motion for Extraordinary Relief** and filed prior to the expiration of the deadline in question.
8. **Continuances:** All requests for continuances must be submitted in writing, with a copy to opposing party, and directed to the Honorable Lisette Shirdan-Harris, Team Leader, via facsimile (215-686-5137) or U.S. Mail (622, City Hall, Philadelphia, PA 19107). **However, said request may be made only under exigent circumstances.**
9. **Jury Charge:** an agreed upon Jury Charge and an agreed upon Jury Verdict Sheet must be presented to the trial judge at the time of jury selection.

CERTIFICATION

This extension is necessary due to the extraordinary circumstances caused by the COVID-19 pandemic, which have impeded the parties' collective ability to advance this case pursuant to the currently applicable case management deadlines.

I hereby certify that I have conferred with counsel for [PARTY NAME(S)] and that all parties agree to the need for the requested extension. I make this certification subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

The parties shall maintain a written confirmation of their agreement.

Electronic signature is acceptable.

BY: _____

, Esquire

Attorney for [PARTY NAME]

Date:

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
 PHILADELPHIA COURT OF COMMON PLEAS—CIVIL TRIAL DIVISION

	:	
	:	
	:	
	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY, PA
Plaintiffs	:	
	:	
v.	:	_____ TERM, 20__
	:	
	:	NO. _____
	:	
	:	
Defendants	:	
	:	

**PRAECIPE FOR AGREED UPON ORDER FOR EXTRAORDINARY RELIEF FOR
 ARBITRATION APPEAL CASES DURING COVID-19 JUDICIAL EMERGENCY**

Note: This *Praecipe* must be e-filed under the category (1) Motion/Petition (2) Motion for Extraordinary Relief. (This is for Court Administration purposes only. The submission will be docketed as a Praecipe.)

To the Office of Judicial Records:

Pursuant to the Court’s COVID-19 protocol and subject to the below certification, kindly enter the following agreed upon case management order, which resets the following case management deadlines:

1. **ATTACHMENT:** All counsel and parties are hereby attached for the **January 2021 Trial Pool**. All parties and or counsel are Ordered to appear at a Mandatory Pre-trial Settlement Conference, which will be scheduled any time on or after **07-DEC-2020**, at **9:00 AM**, in Courtroom 622 City Hall, Philadelphia, PA 19107, and bring with them a completed settlement conference memorandum. Notice of said conference shall be sent to counsel at least 30 days in advance of the conference.
2. **Discovery Deadline:** All discovery shall be completed *no later than 08-SEP-2020*.

3. **Expert Deadline:** *Plaintiff's expert report* (if applicable), including any supplemental report, is to be served on opposing counsel and/or opposing party **on or before 08-SEP-2020**. *Defendant's expert report* is to be served on opposing counsel and/or opposing party **on or before 05-OCT-2020**.
4. **Dispositive Motions:** All dispositive motions must be filed *no later than 05-OCT-2020*.
5. **Motions in Limine:** All Motions in Limine must be filed *no later than 15 days prior to trial*. All responses must be filed *no later than 10 days thereafter*.
6. **Witnesses & Exhibits:** 15 days prior to the pre-trial settlement conference, all counsel shall serve on opposing counsel a list of all witnesses who may be called to testify at trial by name and address. Counsel should expect any witness not listed to be precluded from testifying at trial; and a list of all exhibits the party intends to offer into evidence. All exhibits should be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial.
7. **Extensions:** Requests to extend any case management deadline **must be submitted by filing a Motion for Extraordinary Relief** and filed prior to the expiration of the deadline in question.
8. **Continuances:** All requests for continuances must be submitted in writing, with a copy to opposing party, and directed to the Honorable Lisette Shirdan-Harris, Team Leader, via facsimile (215-686-5137) or U.S. Mail (622, City Hall, Philadelphia, PA 19107). **However, said request may be made only under exigent circumstances.**
9. **Jury Charge:** an agreed upon Jury Charge and an agreed upon Jury Verdict Sheet must be presented to the trial judge at the time of jury selection.

CERTIFICATION

This extension is necessary due to the extraordinary circumstances caused by the COVID-19 pandemic, which have impeded the parties' collective ability to advance this case pursuant to the currently applicable case management deadlines.

I hereby certify that I have conferred with counsel for **[PARTY NAME(S)]** and that all parties agree to the need for the requested extension. I make this certification subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

The parties shall maintain a written confirmation of their agreement.
Electronic signature is acceptable.

BY: _____

, Esquire

Attorney for [PARTY NAME]

Date: