IN THE STATE COURT OF COBB COUNTY
STATE OF GEORGIA

STANDING ORDER FOR PRETRIAL ORDERS

The following procedures are to be followed in the preparation and filing of proposed Consolidated Pretrial Orders:

1. If discovery has not been completed, counsel should not proceed with preparation of the proposed Pretrial Order.

2. If trial witnesses and trial exhibits have not been previously disclosed in response to discovery requests, counsel should confer and supplement responses to discovery as required by O.C.G.A. §9-11-26(e). If this disclosure will delay the entry of a pretrial order, counsel shall immediately notify the Court in writing.

3. Counsel shall attempt in good faith to consolidate the pretrial order. The Court will not enter pretrial orders which contain provisions attempting to reserve the right to amend the pretrial order or reserve the right to conduct discovery. Amendments will be allowed only upon order of the Court and upon good cause shown.

4. If special damages are being alleged, they must be stated *with specificity*, including the identity and amount of each item of special damages.

5. The following **shall be added to the Consolidated Pretrial Order** at paragraph 3:

   Motions in Limine. Except for unforeseen evidentiary issues, **all motions in limine and responses thereto are to be filed prior to, or as a part of, the proposed pretrial order**. The following motions in limine are hereby made by the parties including any supportive legal citations. THE COURT SHALL RULE ON SAID MOTIONS WITHOUT ORAL ARGUMENT UNLESS A HEARING IS ORDERED BY THE COURT UPON REQUEST OF EITHER PARTY.

   Plaintiff's Motions in Limine:

   Defendant's Motions in Limine:

6. The following **shall be added to the Consolidated Pretrial Order** at paragraph 21(d):

   a. Trial Depositions: All depositions for preservation of evidence at trial **shall be taken no later than 90 days following entry of the Pretrial Order** unless otherwise ordered by the Court upon good cause shown by written motion.

   b. Deposition Objections: Prior to trial, counsel shall make a good faith effort to resolve any objections in depositions to be presented at trial. **All unresolved objections, together with argument and citations, shall be filed, with a copy to the Court, no later than five days prior to trial.** Any objections not brought before the Court prior to trial shall be deemed waived.

   c. Medical Narratives: Prior to trial counsel shall make a good faith effort to resolve any objections to proposed medical narrative reports. THE COURT SHALL RULE ON ANY OBJECTIONS TIMELY FILED, PURSUANT TO O.C.G.A. §24-3-18, WITHOUT ORAL ARGUMENT UNLESS A HEARING IS ORDERED BY THE COURT UPON REQUEST OF EITHER PARTY AT THE TIME OF FILING.

COBB COUNTY, GA
FILED IN OFFICE
2003 FEB 18 AM 10:
STATE COURT CLERK

So Ordered this 17 day of February, 2003.

David P. Darden, Judge
State Court of Cobb County