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5 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE**
6 **CENTRAL JUSTICE CENTER**
7

8 **PRETRIAL ORDER**
9 **Judge: Hon. Bradley Erdosi**
10 **Dept: C27**
11

12 This Pretrial Order applies to all cases assigned to Judge Bradley Erdosi.

13 **1. General Policies and Procedures.**

14 The Court requires all parties to be familiar with and adhere to its Department procedures
15 and guidelines posted on the Orange County Superior Court website and available at
16 <https://www.occourts.org/system/files/civil/erdosiprocedures.pdf>.

17 **2. Expectations of Counsel and Self-Represented Litigants.**

18 The Court expects all counsel and self-represented parties to act in a professional manner
19 and follow the Orange County Bar Association Civility Guidelines.

20 **3. Pre-Trial Responsibilities of Counsel and/or Self-Represented Parties.**

21 All pretrial documents are to be filed at least five court days before trial. Counsel and/or
22 parties are ordered to comply with Civil Local Rule 317.

23 At least three court days before trial, the parties shall deliver to the clerk a tabbed three-
24 ring Joint Trial Notebook that contains the following, if applicable:

- 25 a. Table of Contents.
26 b. Printed copies of the operative pleadings (including the operative petition,
27 responses/objections, etc.).

- c. Joint Witness List listing the name, brief description, and time estimate for each witness. Two separate courtesy copies of the Joint Witness List must also be provided to the Clerk.
- d. Stipulations of fact, exhibit admissibility and/or foundation, or of anything else relevant to the trial.
- e. Joint List of Controverted Issues as to any matters to be determined by the Court.
- f. Joint Exhibit List. Two separate courtesy copies also must be provided to the Clerk.
- g. Trial Briefs.
- h. Motions in limine, along with any oppositions and replies thereto.

4. Motions in Limine

In limine motions must be exchanged and discussed no later than the Issue Conference required under Local Rule 317. The parties must meet and confer in a good faith effort to resolve as many in limine motions as possible before trial.

Overbroad and general motions in limine are to be avoided. Motions in limine may not be used as a procedural shortcut to the requirements of a statutory motion. “In limine motions are designed to facilitate the management of a case, generally by deciding difficult evidentiary issues in advance of trial.... What [they] are not designed to do is to replace the dispositive motions prescribed by the Code of Civil Procedure.” (*Tung v. Chicago Title Co.* (2021) 63 Cal. App. 5th 734, 758, citing *Amtower v. Photon Dynamics, Inc.* (2008) 158 Cal.App.4th 1582, 1593.)

5. In-Person Trial

All trials are to be conducted in person. All counsel are ordered to be personally present throughout the trial. All witnesses must be present during their testimony unless good cause is shown and otherwise ordered by this Court.

1 **6. Witnesses**

2 Witness must be lined up and ready to testify so as to avoid any delays. Counsel and/or
3 self-represented litigants shall advise the Court and opposing side promptly of any additions to
4 their witness list or problems with witnesses' availability. Counsel and/or self-represented
5 litigants must advise their witnesses of rulings that apply to or affect their testimony.

6 If a witness or a party needs an interpreter, the parties should bring this to the attention of
7 the Court prior to the commencement of trial.

8 **7. Objections**

9 Speaking objections are not permitted. When objecting, parties should state the word
10 "Objection" along with the legal basis for the objection (e.g., "Objection, Hearsay."). Counsel
11 and/or self-represented parties are not allowed to interrupt each other or the Court.

12 **8. Exhibits**

13 All exhibits are to be uploaded to the Orange County Superior Court Electronic Evidence
14 Portal within three days of the Rule 317 Conference. The requirement to upload exhibits before
15 trial does not apply to impeachment exhibits.

16 If a witness is testifying remotely, counsel and/or self-represented parties must meet and
17 confer to ensure that the evidence being shown to a witness is consistent with the evidence pre-
18 marked and uploaded to the Orange County Superior Court Electronic Evidence Portal.

19 The Electronic Evidence Portal can be accessed by clicking on the following link:

20 <https://www.occourts.org/online-services/electronic-evidence-portal>.

21 Instructions for using the Electronic Evidence Portal can be found on the Orange County
22 Superior Court Website or by accessing the following link:

23 https://www.occourts.org/system/files/general/electronic_evidence_public_instructions.pdf.

24 Once trial has commenced, the parties may not upload any additional exhibits to the
25 Orange County Superior Court Electronic Evidence Portal without permission from the Court.

1 All parties are ordered to exchange/share exhibits within the Electronic Evidence Portal
2 at least five days prior to trial call. Failure to do so may result in the trial being continued and
3 the Court setting an OSC re: sanctions against any non-compliant party.

4 Counsel and/or self-represented parties are expected to have already attempted to
5 stipulate to the admissibility and/or foundation for all exhibits with those agreements reflected
6 on the Joint Exhibit List.

7 On the day of trial, the parties are directed to bring one copy of all of the exhibits (tabbed
8 in one or more three-ring binders), printed from the Electronic Evidence Portal showing the case
9 number and exhibit number at the top of each exhibit.

10 **9. Transcripts**

11 Transcripts must be supplied for the Court, opposing party, and any witness for any audio
12 recording played in open court in accordance with California Rules of Court. Transcripts should
13 be marked for the court record only and will not be admitted into evidence.

14 **10. Deposition Transcripts**

15 The parties shall meet and confer and bring to court on the first day of trial certified copies
16 of any deposition transcripts that will be used during trial. Prior to commencement of trial,
17 counsel shall file a notice of lodging with the Court for each deposition being lodged, as well as
18 each party's designations/counter designations for each deposition that will be used during trial.

19 **11. Jury Instructions And Special Verdict Forms**

20 Prior to the first day of trial, the parties shall meet and confer in person or telephonically
21 on the issue of jury instructions and verdict forms. On the first day of trial, the parties shall submit
22 to the Court a joint set of agreed upon jury instructions, and a joint special verdict form, if
23 requested.

24 If the parties are unable to agree on particular jury instructions or language contained in
25 special verdict forms, the parties must provide the Court the following three categories of
26 documents: (1) instructions that are jointly agreed upon; (2) instructions / special verdict form(s)

1 requested by plaintiff(s) and objected to by defendant(s); and (3) instructions / special verdict
2 form(s) requested by defendant(s) and objected to by plaintiff(s).

3 Notably, the parties are advised that the CACI instructions prepared by the Judicial
4 Council of California are very often appropriate, and the Court discourages special instructions.
5 Moreover, verdict forms must not contain the identity or address of any attorney, nor shall Doe
6 defendants be listed thereon.

7 **12. Post Trial Matters**

8 At the conclusion of trial, each counsel and/or self-represented party is ordered to retain
9 exhibit(s) offered by such counsel/party until one of the following events occurs:

- 10 a. All parties agree in writing that the exhibits may be destroyed;
- 11 b. Any appeal from the judgment has been finally decided and, the event of a
12 reversal, any retrial has concluded; or
- 13 c. The time for any appeal from the judgment has passed without any notice of
14 appeal being filed.

15 **13. Jury Fees and Court Reporters**

16 Jury fees are to be paid and posted every day that the Court is in trial. Absent a court
17 order, the Court does not provide a court reporter for trial. If a party or the parties desire to have
18 an official court reporter, the party or parties must arrange for a court reporter with Caseview
19 functionality to be available.

20 For jury trials, the same court reporter should be utilized throughout the trial to avoid
21 having the jury wait for any requested readback. In addition, the parties should be prepared to
22 discuss whether they are willing to waive a court reporter for voir dire, for sidebar conferences,
23 and for reading of jury instructions. It is the practice of the Court to memorialize all sidebar
24 conferences as soon as practical on the record.

1 **14. Notice of this Order**

2 Plaintiff's counsel or Plaintiff, if appearing on his or her own behalf, shall immediately
3 serve this Order on all parties, including any new parties to the action.

4 **15. Failure to Comply with Standing Order**

5 Any violation of and/or failure to comply with the orders set forth herein may result in
6 the Court continuing the matter and/or issuing sanctions pursuant to CCP §§128.5 and/or 177.5.
7 IT IS SO ORDERED.

8
9 Date: April 14, 2026



Judge Bradley Erdosi