

SECTION I | MOTION PRACTICE

1. Lawyers should avoid unnecessary motion practice or other judicial intervention by negotiating and agreeing with other counsel whenever practicable. For example, before setting for hearing a nondispositive motion, counsel shall make a reasonable effort to resolve the issue.
2. A lawyer should not force an adversary to make a motion and then not oppose it.
3. After a hearing, the attorney charged with preparing the proposed order should prepare it promptly, generally no later than the following business day, unless it should be submitted immediately to the court. The order fairly and accurately must represent the ruling of the court, and if the court ruled orally in open court, counsel should not disagree with the language of a proposed order for the sole purpose of re-arguing the matter before the court.
4. Before submitting a proposed order to the court, attorneys should provide the proposed order to opposing counsel in word.doc or WordPerfect format (or the like) for their review, approval, or proposed redline edits. Opposing counsel should then promptly provide counsel with either their approval of the proposed order or their proposed redline edits to the proposed order. If there is an agreement to the form of the proposed order, counsel should advise the court of the same when submitting the proposed order to the court. If counsel cannot agree on the form of the proposed order, counsel should immediately submit copies of both competing proposed orders for the court's consideration.

