

SECTION 18 | MOTIONS IN LIMINE (MIL)

A. MIL may not be scheduled for a hearing unless counsel have complied with the “*Meet and Confer Requirement*” (See Section III L.), *supra* and such MIL contain a certification of a good faith attempt as to each item to resolve the matter without court action in the form of a Certificate of Compliance (attached hereto as “Exhibit A”) that the conference has occurred in the Notice of Hearing filed with the Court. Notices of hearing on MIL must identify the specific issues which remain in controversy after counsel have met and conferred. MIL will not be heard during the trial.

B. All case specific MIL shall be filed, served, noticed, and heard or agreed to by the parties no later than the deadline set forth in the case management order or the order setting case for jury trial. The MIL shall state with particularity the grounds upon which it is based and the substantial matters of law to be argued and shall identify any evidence or supporting material on which the movant relies.³ Opposing counsel shall have five (5) business days to file a written response if they wish. Courtesy copies of such MIL, Notices of Hearing, written response(s), hearing notebooks, legal memorandums and citations are governed by Sections III I. and J. *supra*.

C. The Court may summarily rule on any MIL not written with particularity as described above. Any MIL not timely filed and/or not discussed by counsel at the meet and confer and (if unresolved) not set for hearing will be considered abandoned.

D. The party filing the MIL will prepare the proposed order on any contested hearing reflecting the Court’s rulings(s). All counsel is reminded that rulings on MIL are non-final orders subject to modification during trial as evidence is presented.

