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IN THE DISTRICT COURT OF APPEAL
OF THE STATE OF FLORIDA, FOURTH DISTRICT

PALM BEACH COUNTY SCHOOL
BOARD,

CASE NO. 4D19-0192
L.T. No. 18-1883

Appellant,

v.

MICHAEL BAKST, as Trustee in
Bankruptcy for Eagle Arts Academy, Inc.

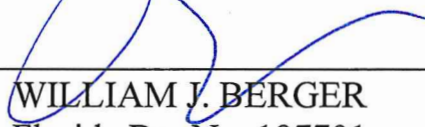
Appellee.

ON REVIEW FROM A FINAL ORDER
Of the Florida Division of Administrative Hearings

**APPENDIX TO APPELLEE'S MOTION
TO RESCHEDULE ORAL ARGUMENT**

WEISS, HANDLER & CORNWELL, PA
Attorneys for Appellee
One Boca Place, Suite 218-A
2255 Glades Road
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Facsimile: (561) 997-5280

By: _____


WILLIAM J. BERGER
Florida Bar No. 197701
wjb@whcfla.com
tc@whcfla.com
filings@whcfla.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this Appendix to Appellee's Motion to Reschedule Oral Argument has been e-filed via Florida E-Filing Portal and thereby served by electronic mail on counsel for Appellant, Sean Fahey, Esq., 3318 Forrest Hill Blvd., Suite C-331, West Palm Beach, FL 33406, sean.fahey@palmbeachschools.org this 2 day of January, 2020.

WEISS, HANDLER & CORNWELL, PA
Attorneys for Appellee
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By: _____

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ORDER SETTING ORAL ARGUMENT

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FOURTH DISTRICT, 110 SOUTH TAMARIND AVENUE, WEST PALM BEACH, FL 33401

December 23, 2019

CASE NO.: 4D19-0192

L.T. No.: 18-1883

PALM BEACH COUNTY SCHOOL
BOARD

v. MICHAEL R. BAKST, TRUSTEE IN
BANKRUPTCY FOR EAGLE ARTS
ACADEMY, INC.

Appellant / Petitioner(s)

Appellee / Respondent(s)

BY ORDER OF THE COURT:

This case is set for Oral Argument on February 25, 2020, at 11:30 A.M. for 15 minutes per side. **If a side anticipates more than two attorneys sitting at counsel table during oral argument, it shall contact the Marshal's Office by phone at least two business days before the oral argument session.** The court calendars can be viewed on this court's website at www.4dca.org.

Attorneys not registered with this court's eDCA and pro se parties are required to file a "Notice of Receipt of Oral Argument" within ten (10) days from the date of this order, acknowledging they have received this order.

Served:

cc: William J. Berger
Sean Fahey

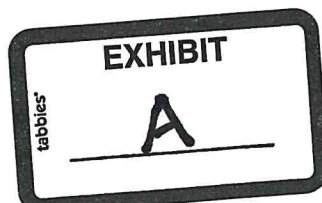
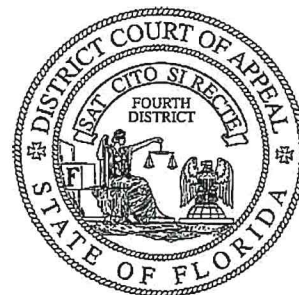
Ned R. Nashban

Henry B. Handler

mj



LONN WEISSBLUM, Clerk
Fourth District Court of Appeal



CASE MANAGEMENT ORDER

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

CIRCUIT CIVIL DIVISION AN
CASE NO. 50-2017-CA-013617-XXXX-MB

EILEEN GOLD,

Plaintiff/Petitioner

vs.

GEORGE W SCHAEFFER LIVING TRUST
DATED DECEMBER 16 2008 AS AMENDED,
GWS 2 INC, PEOPLES TRUST HOLDINGS LLC,
et al.,

Defendant/Respondents.

CASE MANAGEMENT ORDER

THIS CAUSE came before the Court on June 17, 2019, for a Case Management Conference pursuant to the Court's Order Designating Action as Complex (D.E. 130). After reviewing the Joint Case Management Report, and the Court being otherwise fully informed in the matter, it is thereby

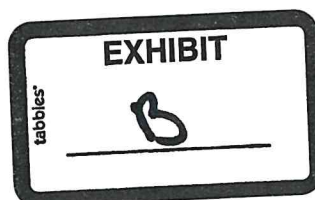
ORDERED and **ADJUDGED** as follows:

1. Until further Order of the Court, the following schedule of events shall control the management and proceedings in this case.

COMMUNICATION WITH COURT AND COUNSEL

2. **LEAD TRIAL COUNSEL.** The parties are represented by the following persons who shall be designated "Lead Trial Counsel":

- a. Etan Mark, Esq. for Plaintiff, Gold.
- b. William Berger, Esq. for Defendant, Schaeffer.



3. **COURT COPIES.** The Fifteenth Judicial Circuit, Division AN receives pleadings by e-filing. Therefore, it is not necessary to provide courtesy copies of motions and memoranda related thereto to the Court's chambers unless such motion is set for hearing, either by special set or on Uniform Motion Calendar, in which case such copy of the motion to be heard, supporting memorandum, and the proposed order shall be submitted to the Court no later than seven (7) days before the scheduled hearing. Courtesy copies of emergency motions shall be delivered to the court immediately upon being filed with the Clerk of the Court.

PRELIMINARY FINDINGS AND DEADLINES

4. **AMENDMENTS & ADDING PARTIES.** Any motions for leave to amend the pleadings to add additional allegations, claims, parties or otherwise, shall be filed no later than July 31, 2019. Any special set hearing necessitated by the filing of any motion to amend is set for hearing on August 26, 2019, at 9:00 a.m. (1 hr(s). reserved). The parties may add motions to this hearing by agreement. The parties shall advise the Court no later than ten (10) days before the scheduled hearing as to whether the hearing time is still needed. Any amendments thereafter will be permitted only upon a showing of good cause.

5. **PROCEDURES.** The parties are directed to comply in all respects with the following rules where applicable to the pending proceedings, Florida Rules of Civil Procedure, Florida Rules of Evidence, and the Florida Rules of Judicial Administration.

MOTIONS, DISCOVERY, ALTERNATIVE DISPUTE

RESOLUTION AND TRIAL

6. MOTIONS.

a. To the extent the parties intend to file motions to dismiss, motions to bifurcate, motions for jury trial, motions for leave to assert a claim for punitive damages, or other pre-trial motions, the Court designates the following time periods in which such motions shall be filed, briefed, and argued:

- 1) Motions to Dismiss or Strike Pleadings: June 28, 2019.
- 2) Motion for Jury Trial: June 28, 2019.
- 3) Motions to Bifurcate: June 28, 2019.
- 4) Motion for Leave to Add Claim for Punitive Damages: September 30, 2019

5) Any special set hearing necessitated by the filing of any of the foregoing motions to dismiss or strike pleading, motion for jury trial, or motion to bifurcate is set for hearing on July 11, 2019 at 11:00 a.m. (1 hr(s). reserved). The parties shall advise the Court no later than ten (10) days before the scheduled hearing as to whether the hearing time is still needed. The parties shall request a special set hearing on any motions for leave to add claims for punitive damages.

b. It is further ordered that the setting of the deadline for completion of discovery shall not limit any party from filing summary judgment motions as to merits issues during such period, but any such motions should be very narrowly drawn so as to address only issues on which fact discovery has been completed. If there are still motions pending after the discovery period, the court will set a briefing schedule at that time.

c. For the purposes of the length limitations on briefs, no brief shall be submitted to the Court in excess of twenty (20) pages on any motion that is specially set, and in excess of five (5) pages on any motion set for hearing on the Court's Uniform Motion Calendar.

d. **SIMPLIFICATION OF ISSUES.** The Parties shall, no later than thirty (30) days prior to trial, meet and discuss the formulation and simplification of issues in this action.

7. **ADMISSIONS, EXCHANGE OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AUTHENTICITY OF DOCUMENTS AND ADMISSIBILITY OF EVIDENCE.** The Parties shall, no later than thirty (30) days following the entry of this Order meet and discuss the possibility of obtaining admissions of fact, the voluntary exchange of documents and electronically stored information, stipulations regarding authenticity of documents, electronically stored information and the need for advance rulings

from the court on admissibility of evidence in this action. The parties shall meet again no later than thirty (30) days before trial to revisit any new or unresolved issues or matters from the previous meet and confer. Any agreements in this regard shall be presented to the Court no later than ten (10) days prior to trial

8. DISCOVERY.

a. Discovery Deadlines.

- 1) The parties shall have until October 31, 2019 to conduct and conclude discovery of fact witnesses.
- 2) The parties shall have until November 18, 2019 to conduct and conclude discovery of expert witnesses.
- 3) All discovery shall be served and otherwise conducted so that the response date will be on or before the above stated dates for the conclusion of discovery.
- 4) It is further ordered that the setting of the discovery deadline will not limit any party from filing summary judgment motions during the period, but any such motions should be narrowly drawn to address only issues on which discovery has been completed.
- 5) The parties are reminded of the liberal rules governing discovery and are specifically admonished to avoid abusive discovery practices such as blanket objections not reasonably tailored to the specific request, meritless and specious objections, piecemeal and dilatory responses and production, over-reaching and over-broad discovery tactics, to name a few. The Court will not hesitate to impose sanctions where it finds that abusive discovery tactics have occurred that have caused unnecessary delay, prejudice, and expense.

b. Protective Orders. The Parties shall discuss, if appropriate, whether discovery will need to be facilitated by entry of a protective order. If so, Counsel for the Parties shall meet within 30 days of the date of this order to try and agree on the provisions of a mutually acceptable Confidentiality Agreement. If an agreement cannot be reached, one of the parties should file a

motion seeking a Protective Order.

c. **Discovery Guidelines.** The following further limitations and guidelines are hereby placed on discovery:

1) Depositions shall be conducted in accordance with the following guidelines:

a) All parties or employees will be made available for deposition on Fifteen (15) days' notice to counsel.

b) Counsel shall not direct or request that a witness not answer a question, unless counsel has objected to the question on the ground that the answer is protected by privilege or a limitation on evidence directed by the court.

c) Counsel shall not make objections or statements which might suggest an answer to a witness. Counsel's statements when making objections should be succinct, stating the basis of the objection and nothing more.

d) Counsel and their witness clients shall not engage in private, off-the-record conferences while the deposition is proceeding in session, except for the purpose of deciding whether to assert a privilege.

e) Deposing counsel shall provide to the witness's counsel a copy of all documents shown to the witness during the deposition. The copies shall be provided either before the deposition begins or contemporaneously with the showing of each document to the witness. The witness and the witness's counsel do not have the right to discuss documents privately before the witness answers questions about them.

f) **Counsel shall at all times during any depositions, as well as any other proceedings in this action strictly observe all rules of procedure, as well as the Standards of Professional Courtesy and Civility endorsed by the Judges of the Fifteenth Judicial Circuit, a copy of which is attached hereto.**

g) Absent leave of the Court, the parties may conduct only that discovery as

specifically provided for in this Order (this Order controlling over the Procedures).

h) No extensions of time shall be granted without written consent of the opposing party or by order of the court.

d. **EXPERT WITNESSES.** To the extent the Parties anticipate having expert witnesses testify at trial, the party bearing the burden of proof on any issue requiring expert testimony shall designate the experts expected to be called at trial and provide all information as provided for and required in the rules of procedure applicable to this proceeding. Each party responding shall then designate its experts and provide all information as provided for and required in the rules of procedure applicable to this proceeding. The following deadlines shall apply to the designation of experts by the parties hereto:

1) On or before October 18, 2019, the Parties shall disclose the names of any experts the Parties may call to testify at trial by serving on each party an expert witness list containing (a) the names of all expert witnesses expected to be called at trial, (b) the expert's area of expertise, (c) the expert's address, telephone number, and email address, (d) the expert's curriculum vitae, and (5) five available dates for the expert's deposition and provide to the other party any written reports from such experts.

2) All parties shall designate any counter or rebuttal experts (based on the prior designations indicated above) and provide any written reports from such experts to all other parties on or before October 31, 2019.

3) All depositions of experts shall be completed no later than thirty (30) days prior to the date set for the commencement of trial.

9. **DISPOSITIVE MOTIONS.** Dispositive motions, including but not limited to motions for summary judgment and partial summary judgment, shall be filed no later than November 25, 2019 and may be set at a mutually convenient time on the Court's docket but in no event later than the date set for the Final Pre-Trial Conference.

Any unresolved dispositive motion pending at the time of the Final Pre-Trial Conference will be heard at the Final Pre-Trial Conference.

10. **MOTIONS IN LIMINE.** Motions in limine may be filed at any time, but must be heard at least twenty (20) days prior to the first day of trial, except upon showing of good cause.

11. **ALTERNATIVE DISPUTE RESOLUTION.**

a. The Court encourages all efforts by the parties to resolve the issues pending in this case. While this action is proceeding the parties may select and implement any one or more alternative dispute resolution methods recognized in the rules of procedure applicable to this proceeding or in the Florida Statutes.

b. **Mediation.** This action must go to mediation before proceeding to trial. The Parties are ordered to conduct mediation on or before thirty (30) days prior to the date set for trial.

c. **Mediation Outcome.** Plaintiff's counsel is ordered to advise the court, in writing, of the outcome of the mediation no later than five (5) days following the conclusion of the mediation conference.

12. **PRE-TRIAL STATEMENT AND PRE-TRIAL CONFERENCE.**

a. **Conferences.** Counsel for the parties shall discuss the need for additional or periodic status conferences before trial. If additional case management conferences are required, the same shall be set upon proper filing of a motion therefor and notice.

b. **Final Case Management Conference.** In accordance with Fla. R. Civ. P. Rule 1.201 or such other rule of procedure as may be applicable to this proceeding, a Final Case Management Conference is set for September 23, 2019 at 9:00 a.m. (1 hr(s). reserved). The parties shall confer as required by Rule 1.201(d) and file a case status report in compliance with Rule 1.201(d).

c. A Final Pre-Trial Conference is scheduled on January 17, 2020 at 9:00 a.m.

(1 hr(s). reserved).

d. The parties are directed to meet together in person no later than fourteen (14) days prior to the date set for the Final Pre-Trial Conference., for the purpose of discussing any remaining scheduling, docket, discovery, or other issues necessary to be addressed in the Joint Final Pretrial Statement.

e. A Joint Final Pretrial Statement shall be prepared and submitted to the Court five (5) days prior to the Final Pretrial Conference. The parties shall comply with Fla. R. Civ. P. Rule 1.201, the Uniform Order Setting Trial and Pre-trial and the Uniform Pre-Trial Conference Order.

13. **TRIAL.**

a. The parties estimate the trial will be completed in ten (10 days) To the extent there are any issues regarding the conduct of this trial, such as by jury on the issues so triable or by the Court on all equitable issues, such issues shall be presented to the Court no later than the Final Case Management Conference.

b. The trial is scheduled for February 17, 2020 in Courtroom 10E, Palm Beach County Courthouse, 205 North Dixie Highway, West Palm Beach, Florida 33401 and will continue through February 28, 2020 ten (10) days have been reserved). The parties and their counsel have confirmed their availability for the foregoing trial dates.

c. If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Tammy Anton, Americans with Disabilities Act Coordinator, Palm Beach County Courthouse, 205 North Dixie Highway, West Palm Beach, Florida 33401; telephone number (561) 355-4380 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

d. The parties shall comply with the Court's Divisional Instructions regarding the

pre-marking of all trial exhibits and all other obligations set forth in Fla.R.Civ.P. 1.201.

DONE AND ORDERED in Chambers at West, Palm Beach County, Florida this Monday, June 24, 2019.

The image shows the official seal of the 15th Judicial Circuit of the State of Florida. The seal is circular and features a palm tree in the center, surrounded by the words "THE 15TH JUDICIAL CIRCUIT" and "STATE OF FLORIDA". Overlaid on the seal is a handwritten signature in dark ink, which appears to read "Howard K. Coates, Jr.".

HOWARD K. COATES, JR.
CIRCUIT JUDGE

Copies furnished to:
See Attached List

SERVICE LIST

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Standards of Professional Courtesy and Civility

Preamble

Attorneys are often retained to represent their clients in disputes or transactions. The practice of law is often an adversarial process. Attorneys are ethically bound to zealously represent and advocate in their clients' best interests. Nonetheless, certain standards of professional courtesy exist that must be observed in the courtroom, the board room, or any other setting in which an attorney is present.

The following standards of professional courtesy describe the conduct expected of attorneys practicing before state and federal courts and other tribunals in Palm Beach County as well as in South Florida, including those in Broward, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, and St. Lucie counties. These standards are not meant to be exhaustive, but instead to set a tone or guide for conduct not specifically covered by these standards. The overriding principles promoted by these standards are good-faith, civil and respectful communication between counsel and similar cooperation with judges, arbitrators, mediators, clerks, court staff, witnesses and non-parties.

These standards have been codified with the intent that their dissemination will educate and remind attorneys and their clients that attorneys practicing in Palm Beach County as well as in South Florida are expected to behave professionally and civilly at all times. They have received the approval of the Board of Directors of the Palm Beach County Bar Association. They have also been endorsed by the judges of the 15th Judicial Circuit, who expect professional conduct by all attorneys who appear and practice before them.

In 1990, the Board of Governors of The Florida Bar adopted the Ideals and Goals of Professionalism. In 2011, the Florida Supreme Court amended its oath of attorney admission ("Oath of Attorney Admission") to require that attorneys taking the oath pledge to opposing parties and counsel "fairness, integrity, and civility, not only in court, but also in all written and oral communications." In 2013, the Florida Supreme Court issued an opinion entitled *In re: Code for Resolving Professionalism Complaints* (SC13-688) that requires each judicial circuit in Florida to create a local professionalism panel to hear grievances for professionalism and civility violations. These standards below should be read together with the Ideals and Goals of Professionalism, the Oath of Attorney Admission, and the Florida Supreme Court's opinion aimed at improving attorneys' professionalism and civility.

I. Scheduling

1. Attorneys should endeavor to provide opposing counsel and pro se litigants (collectively, "opposing counsel"), parties, witnesses, and other affected persons, sufficient notice of depositions, hearings and other proceedings, except upon agreement of counsel, in an emergency, or in other circumstances compelling more expedited scheduling. As a general rule, actual notice should be given that is no less than five (5) business days for in-state depositions,

ten (10) business days for out-of-state depositions and five (5) business days for hearings.

2. Attorneys should communicate with opposing counsel prior to scheduling depositions, hearings and other proceedings, so as to schedule them at times that are mutually convenient for all interested persons. Further, sufficient time should be reserved to permit a complete presentation by counsel for all parties. Upon receiving an inquiry concerning a proposed time for a hearing, deposition, meeting or other proceeding, a lawyer should promptly agree to the proposal or offer a counter suggestion that is as close in time as is reasonably available, and attorneys should cooperate with each other when conflicts and calendar changes are reasonably necessary. Only after making a reasonable effort to confer with opposing counsel should attorneys unilaterally schedule depositions, hearings or other matters.

3. Attorneys should notify opposing counsel, the court or other tribunal, and others affected, of scheduling conflicts as soon as they become apparent. Further, attorneys should cooperate with one another regarding all reasonable rescheduling requests that do not prejudice their clients or unduly delay a proceeding and promptly offer reasonable alternative dates to reschedule a matter.

4. Attorneys should promptly notify the court or other tribunal of any resolution between parties that renders a scheduled court appearance unnecessary or otherwise moot.

5. Attorneys should grant reasonable requests by opposing counsel for extensions of time within which to respond to pleadings, discovery and other matters when such an extension will not prejudice their client or unduly delay a proceeding.

6. Attorneys should cooperate with opposing counsel during trials and evidentiary hearings by disclosing with reasonable advance notice the identities of all witnesses reasonably expected to be called and the length of time needed to present the attorney's client's case, except when a client's material rights would be adversely affected. The attorneys also should cooperate with the calling of witnesses out of turn when the circumstances justify it.

II. Discovery

1. Attorneys should pursue discovery requests that are reasonably related to the matter at issue. Attorneys should not use discovery for the purpose of harassing, embarrassing or causing the adversary to incur unnecessary expenses.

2. Attorneys should not use discovery for the purpose of causing undue delay or obtaining unfair advantage.

3. Attorneys should ensure that responses to reasonable discovery requests are timely, organized, complete and consistent with the obvious intent of the request. Attorneys should not produce documents in a way calculated to hide or obscure the existence of documents. A response to a request to produce should refer to each of the items in the request and the responsive documents should be produced as they correspond to each request or as they are kept in the usual course of business.

III. Conduct Directed to Opposing Counsel, the Court/Tribunal, and Other Participants

in the Proceedings

1. As it brings dishonor to the legal profession, attorneys should refrain from criticizing or denigrating opposing counsel, the court/tribunal and their staff, the parties, and witnesses before clients, the public, and the media.
2. Attorneys should be, and should impress upon their clients and witnesses the need to be, courteous and respectful and not rude or disruptive with the court/tribunal, opposing counsel, parties and witnesses.
3. Attorneys should make an effort to explain to witnesses the purpose of their required attendance at depositions, hearings or trials. Absent compelling circumstances, attorneys should give adequate notice to non-party witnesses before the scheduling of their depositions, advance notice of a subpoena for a deposition, hearing or trial. Attorneys further should attempt to accommodate the schedules of witnesses when resetting their appearance and promptly notify them of any cancellations.
4. Attorneys should respect and abide by the spirit and letter of all rulings of the court and advise their clients to do the same.
5. Attorneys and their staff should a) act and speak civilly and respectfully to courtroom deputies and bailiffs, clerks, court reporters, judicial assistants and law clerks; b) be selective in inquiries posed to judicial assistants as their time and resources are limited; and c) familiarize themselves with the court's administrative orders, local rules and each judge's published standing orders, practices and procedures.

IV. Candor to the Court/Tribunal and Opposing Counsel

1. Attorneys should not knowingly misstate, misrepresent, or distort any fact or legal authority to the court, tribunal or opposing counsel and shall not mislead by inaction or silence. Further, if this occurs unintentionally and is later discovered, the attorney immediately should disclose and correct the error. Attorneys, likewise, should affirmatively notify the court or tribunal of controlling legal authority that is contrary to their client's legal position.
2. Attorneys immediately should notify opposing counsel of all oral or written communications with the court or other tribunal, except those involving only scheduling or administrative matters.
3. Copies of any submissions to the court or other tribunal (such as e-mails, correspondence, motions, pleadings, memoranda or law, legal authorities, exhibits, transcripts, etc.), should be simultaneously provided to opposing counsel by e-mail or delivery of an electronic or hard copy. For example, if a memorandum of law is hand-delivered to the court, a copy should be simultaneously e-mailed or hand-delivered to opposing counsel.
4. Attorneys should submit factual or legal argument to a court in a motion or memorandum of law and not in the form of an e-mail or letter. Tribunals other than courts, however, may permit more informal means than a motion or memorandum of law for the submission of factual or legal argument.

5. Attorneys should draft proposed orders promptly after a hearing or decision and the orders should fairly and adequately represent the ruling of the court or tribunal. Attorneys should promptly provide, either orally or in writing, proposed orders to opposing counsel for approval. In response, opposing counsel should communicate promptly any objections to the drafting attorney. The drafting attorney then should promptly submit a copy of the proposed order to the court or other tribunal and state whether opposing counsel agrees or objects to the form of the order.

6. Attorneys should draft agreements and other documents promptly after the discussions or agreement so as to fairly reflect the true intent of the parties. Where revisions are made to an agreement or other document, attorneys should point out, redline or otherwise highlight any such additions, deletions or modifications for opposing counsel.

V. Efficient Administration

1. Attorneys should refrain from actions intended primarily to harass or embarrass and should refrain from actions which cause unnecessary expense or delay.

2. Attorneys should, whenever possible, prior to filing or upon receiving a motion, contact opposing counsel to determine if the matter can be resolved in whole or in part. This may alleviate the need for filing the motion or allow submission of an agreed order in lieu of a hearing.

3. Attorneys should, whenever appropriate, discuss discovery planning. Attorneys should also endeavor to stipulate to all facts and legal authority not reasonably in dispute.

4. Attorneys should encourage principled negotiations and efficient resolution of disputes on their merits.

*Approved by the Board of Directors of the Palm Beach County Bar Association, May 2014
Jill G. Weiss, President*

*Endorsed by the Judges of the Fifteenth Judicial Circuit, June 2014
Jeffrey J Colbath, Chief Judge*

EMAIL EXCHANGE

William Berger

From: William Berger
Sent: Tuesday, December 24, 2019 10:02 AM
To: Sean Fahey
Subject: school board appeal-eagle
Attachments: Case_Management_Order-Agreed-Gold_v._Schaeffer.pdf

Sean, I need to move to continue the 2/25 oral argument due to a conflict in another case trial setting. Attached is an order specially setting a case I have for trial 2/17-2/28.

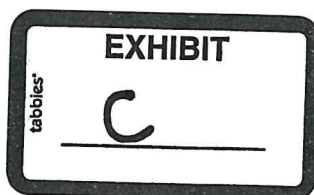
Can I represent to the appellate court that you do not oppose the motion to continue oral argument?

Thank you.

William J. Berger, Esquire



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Fax: (561) 997-5280
Email: wjb@whcfla.com
www.weissandler.com



William Berger

From: Sean Fahey <sean.fahey@palmbeachschools.org>
Sent: Tuesday, December 24, 2019 10:02 AM
To: William Berger
Subject: Out of Office Re: school board appeal-eagle

Thank you for your email.

The School District of Palm Beach County's offices are closed from December 21, 2019 through January 1, 2020.

I will respond to your email upon my return on January 2, 2020.

--

Sean Fahey, Esq.
Associate Attorney
Office of General Counsel
School Board of Palm Beach County
Ph. (561) 969-5852, PX: 45852

Disclaimer: Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

William Berger

From: Sean Fahey <sean.fahey@palmbeachschools.org>
Sent: Thursday, January 2, 2020 8:25 AM
To: William Berger
Subject: Re: school board appeal-eagle

Yes, no opposition.

On Tue, Dec 24, 2019 at 10:02 AM William Berger <wjb@whcfla.com> wrote:

Sean, I need to move to continue the 2/25 oral argument due to a conflict in another case trial setting. Attached is an order specially setting a case I have for trial 2/17-2/28.

Can I represent to the appellate court that you do not oppose the motion to continue oral argument?

Thank you.

William J. Berger, Esquire



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--

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