

**THE HONORABLE JUDGE CHOU
FOURTH JUDICIAL DISTRICT
CIVIL PRACTICE POINTERS & PREFERENCES**

I. Contact with Chambers

- Parties and their attorneys may contact the chambers by:

Email Preferred: 4thJudgeChouStaff@courts.state.mn.us

Phone: (612) 543-1798

II. Motion Practice

- Counsel is required to “meet and confer” before bringing discovery disputes to a hearing.
- Telephone calls are accepted from attorneys to rule on discovery disputes that occur during the course of a deposition.
- Contact chambers to schedule motion hearings.
- Currently motions are on a problem-solving (drug, DWI, GIFT) court rotation until June 2019.
- Contact chambers for specific requirements relating to requests for continuances or changes in the scheduling order.
- Stipulations or proposed orders should be e-filed and a courtesy copy sent to chamber staff in a “.doc” Word file format.

III. Written Submissions

- Contact chambers to request variations/extensions from the briefing schedule.
- Written submissions do not need to be filed during business hours on the due date.
- One courtesy copy of motions should be sent via electronic file.

IV. In-Court Proceedings

- Attorneys should arrive 10 minutes before a hearing.
Attorneys are not required to stand in the courtroom.
- There is no preference for which table/side of the courtroom each party sits at.

- Each side is allowed 15-30 minutes for arguing motions, depending on the extent of the motion.
- Parties are not allowed to bifurcate their oral argument.
- Attorneys should not recap material from their written submissions during oral argument. They should simply indicate an issue is addressed in written submissions.
- If an attorney intends to present new case authority at oral argument, then he/she needs to provide a courtesy copy of the case to the Court and opposing counsel.
- Use of technology is encouraged.
- State any specific procedures you would like attorneys in your courtroom to follow at motion hearings:

V. **Pretrial Procedures**

- *Voir dire* is conducted in part by the judge and in part by attorneys. The Court has a list of general questions. Attorneys can follow-up with their own questions.
- Proposed jury instructions should be submitted to the Court one week before trial.
- Special verdict forms should be submitted to the Court one week before trial.
- Witness lists should be e-filed with the Court one week before trial.
- Motions *in limine* shall be e-filed prior to trial.
- A pre-trial conference shall be held 245 to 60 days prior to trial.
- Contact chambers to request a settlement conference.

VI. **Trial**

- A typical trial day starts at 9:00 a.m. The Jurors are allowed two 20-minute breaks. Lunch is typically at 12:15 p.m. and the day normally finishes at 4:30 p.m.
- Counsel should give the opposing side as much advance notice as reasonably possible regarding which witnesses will be testifying on a particular trial day.
- No arguments shall take place before the jury. Attorneys do not need to stand, but can if they wish.
- Attorneys do not need to stand at the podium when examining witnesses or the jury.

- There are no time limits on opening statements or closing arguments.
- Attorneys must ask the Court's permission before approaching a witness.
- Witnesses and opposing counsel must be addressed formally during trial.
- All trial exhibits should be marked prior to trial. Electronic exhibits may be used.
- Attorneys are encouraged to use technology in the courtroom during trial. Attorneys should make sure to make arrangements with Chambers prior to trial when technology is going to be used during trial.
- Attorneys are not able to obtain daily transcripts during trial.
- Attorneys are not permitted to contact jurors after the conclusion of trial.