



**MAGISTRATE JUDGE JEANNICE WILLIAMS APPENTENG**  
**219 South Dearborn Street**  
**Courtroom 1858**  
**Chambers 1870**  
**Chicago, IL**  
**(312) 435-5667**

**Standing Order Governing Pretrial Procedures and**  
**Final Pretrial Orders for Civil Cases**

This Standing Order sets forth the Court's pretrial procedures and the requirements for submitting a Proposed Pretrial Order for the Court's consideration.

**Final Pretrial Conference**

A final pretrial conference will be held approximately two weeks before trial. The purpose of this conference will be to avoid surprises and to simplify the trial. At the conference, Judge Appenteng will address pending motions *in limine*, objections to witnesses and exhibits, and contested jury instructions, and will discuss trial procedures and scheduling. Lead trial counsel with authority to discuss all aspects of the case must attend.

**Motions *in Limine* and *Daubert* Motions**

Motions *in limine* should be used sparingly to conserve the parties' resources. The Court discourages the filing of "boilerplate" motions *in limine* or motions that address matters not in dispute. Any motion *in limine* filed by a party must be accompanied by a statement that the party has conferred with the opposing party and the opposing party actually intends to offer the evidence that the movant seeks to exclude, or actually opposes admission of the evidence that the movant seeks to include. If the meet-and-confer process results in agreement over evidentiary issues, that agreement may be memorialized in a stipulation entered into at the final pretrial conference.

Motions *in limine* must be filed on the docket by the due date set by the Court, which is separate from the date for the filing of the proposed pretrial order. The Court will set response dates. No replies may be filed without leave of Court. A party must consolidate separate motions in limine into a single filing (meaning the same ECF entry). The parties must also consolidate their responses to motions in limine into a single response brief (meaning the same ECF entry). Separately filed motions or separately filed responses to each motion are not permitted. Absent prior leave of Court, motions *in limine* (not including exhibits) are limited to a total of 15 pages per party (not per motion), and responses (not including exhibits) are likewise limited to a total of 15 pages per party. These limitations do not apply to motions challenging the admissibility of Rule 702 expert testimony pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*

Any *Daubert* motions shall be filed no later than 35 days and responses no later than 21 days before the final pretrial conference.

### **Final Proposed Pretrial Order**

Prior to the final pretrial conference, the parties shall jointly prepare and submit a proposed pretrial order containing the sections and information described below. The Court will set a date for filing the proposed pretrial order. Proposed pretrial orders must be filed on the docket by selecting “Other Filings” and then “Other Documents,” and choosing the proposed pretrial order event in CM/ECF. Courtesy copies are not necessary, however, the proposed pretrial order must be e-mailed to Proposed\_Order\_Appenteng@ilnd.uscourts.gov in **Microsoft Word** format.

Judge Appenteng does not require trial briefs. Parties who wish to file a trial brief must seek leave of Court to do so.

1. *Jurisdiction.* State the jurisdictional basis for each claim. If the parties rely on either diversity jurisdiction or another jurisdictional basis that requires a threshold amount, then state whether the parties agree that the amount in controversy exceeds the amount and include a concise explanation of how the evidence supports that statement.

2. *Trial Attorneys.* List all attorneys trying the case, as well as contact information (business address, telephone number, and e-mail address).

3. *Case Statement.* Provide a concise agreed statement of the case. This is a neutral description of the case. The statement must describe the nature of the case, claims, and defenses. In a jury trial, this statement will be read by the Court to the jury pool during jury selection. Accordingly, the statement needs only enough information to introduce the case to the jury and to ask potential jurors whether they happen to know anything about the case.

4. *Damages Itemization.* Plaintiff (and counter/cross-claimants, if any) shall itemize damages and other relief sought and provide a concise explanation of the evidentiary basis for each itemization.

5. *Trial Length / Number of Jurors.* State the estimated number of trial days, including jury selection, opening statements, and closing arguments, premised on six-hour to six and one-half hour trial-testimony days (these time periods already account for lunch and breaks). Propose estimated time limits for (a) opening statements per side; (b) closing arguments per side (including an initial close and rebuttal for the plaintiff); and (c) the total number of hours of witness examination per side. Also, state the number of jurors that the parties recommend (subject to Federal Rule of Civil Procedure 48(a)).

6. *Stipulations and Uncontested Facts.* In numbered paragraphs, state any stipulations and uncontested facts. No later than 10 business days before the proposed pretrial order's due date, the parties must serve on each other proposed stipulations and uncontested facts. No later than 5 business days before the due date, the parties must confer in good faith to arrive at as many stipulations and uncontested facts as possible. The Court encourages ample stipulations where possible as a good way to conserve the parties' resources.

7. *Witness Description Lists.* Each party shall provide a list of the witnesses, including expert witnesses, divided into (a) witnesses who *will* be called; (b) witnesses whose testimony will be presented by deposition or other prior testimony (indicating whether the presentation will be by reading a transcript or playing a video); and (c) witnesses who *might* be called or whose testimony might be presented. For each witness, provide a concise (2 or 3 sentences) description of the witness and the witness's role in the case. For example: "George Washington is Plaintiff's cousin. Washington witnessed the arrest of Plaintiff where Defendants allegedly used excessive force." Or: "John Adams is Defendant's Chief Operating Officer. Adams made promises concerning the timing of payments under the contract." Witnesses who are not on the lists are barred from testifying unless the proponent shows good cause for the failure to disclose the witness. In a jury case, the names of witnesses on the lists will be read during jury selection to ensure that potential jurors do not personally know any witness.

The witness lists may be filed as separate ECF documents. If so, the proposed pretrial order shall indicate in this section that the witness list(s) will be filed on the docket simultaneously with the proposed pretrial order.

8. *Exhibits and Exhibit Charts.* The parties must submit an exhibit chart, one each for Plaintiff's exhibits and Defendant's exhibits. The charts must state the following: (a) the exhibit number; (b) the date of the document or exhibit, if applicable;

(c) a concise, neutral description of the exhibit; (d) a concise statement of the exhibit's relevance; and (e) whether there is an objection to the exhibit's admission, and if so, a concise explanation of the objection and the proponent's theory of admissibility. The concise explanation of objection and theory of admissibility must be complete (*i.e.*, list each distinct basis for admission or exclusion, such as Rules of Evidence or court opinions) but need not be as exhaustive as a brief would be. Grounds not listed may be waived, ***except for foundation and authentication***. If additional argument on an issue will benefit the Court, it will ask the parties to brief the issue or address it at the final pretrial conference. The chart's format shall be substantially similar to the example below (landscape orientation is encouraged).

No.	Date	Description	Relevance	Objection
1	02/15/06	2005 Performance Review	Proves record of satisfactory job performance	R. 402 relevant; R. 403 confusion. Plaintiff fired in 2011.

In addition to substantive exhibits and Rule 1006 summary exhibits, the chart should also include proposed demonstrative exhibits and any exhibits that are likely to be referred to at trial even though not allowed into evidence. For example, deposition transcripts of witnesses likely to be impeached, or documents likely to be used to refresh memory, should be included on the chart (and assigned an exhibit number and description).

The exhibit charts may be filed as separate ECF documents. If so, the proposed pretrial order shall indicate in this section that the exhibit chart(s) will be filed on the docket simultaneously with the proposed pretrial order.

Any substantive exhibit not objected to shall be deemed stipulated to and admissible into evidence by this Order (**note**: for the exhibit to be entered into the record for the jury's consideration, the exhibit still must be referred to during trial testimony or otherwise published to the jury). Unless the parties stipulate to the admissibility of an exhibit, or the Court by this Order deems it admissible, the proponent must be prepared to properly lay foundation and authenticate the document at trial. The parties shall, however, make a good faith effort to stipulate to the authenticity of exhibits whenever possible. Likewise, parties must limit the objections to only good-faith objections. Frivolous and boilerplate objections will waste time, because in preparation for the pre-trial conference, the Court will review, as much as possible, the exhibits and the objections. Do not over-designate exhibits, because we will examine exhibits one-by-one during the pretrial conference, and plainly inadmissible exhibits will needlessly consume time.

As noted above, non-objected-to exhibits will be admissible into evidence by operation of this Order, without any need for further foundation testimony

(remember, however, that the exhibit must still be referred to during trial testimony or otherwise published to the jury in order for the exhibit to be considered by the jury). But during the trial, for the jury's sake and for the clarity of the record, still move the exhibit into evidence before publishing it to the jury. The Court will ask whether there is any "further" objection, so any pretrial objection is preserved.

**At least 5 business days before the final pretrial conference**, the parties must submit to chambers 2 sets of exhibit binders containing copies of all the proposed exhibits. Exhibits that will be used for impeachment purposes only need not be included in the binders. The parties also must upload electronic copies of the proposed exhibits using a Box.com link the Court will provide. Requests for the link shall be sent to Courtroom Deputy Kym Lozano at [Kym\\_Lozano@ilnd.uscourts.gov](mailto:Kym_Lozano@ilnd.uscourts.gov).

If, due to unforeseen circumstances during trial, a party wishes to introduce an exhibit not previously listed, notice should be given as soon as possible to the opposing side and to the Court so that any objections can be discussed. Absent abuse of this process, an exhibit will not be deemed inadmissible simply because it was not included on the original exhibit list, provided the exhibit/document was produced earlier to the opposing side during discovery.

9. *Deposition Designations.* If a party proposes to introduce a witness's testimony via a deposition rather than live testimony, then the offering party must serve the page/line designations of the deposition transcript on the opposing party 10 business days in advance of the pretrial order's due date. The opposing party must serve objections to designations (including a concise basis for the objection, like the Exhibit Chart) and also state the opposing party's counter-designations (including counter-designations conditioned on an objection being overruled) 5 business days in advance of the pretrial order's due date.

The parties shall generate a joint chart, in page order, that sets forth the designation, objection, counter-designation if objection overruled, any counter-designations, and any objections to the counter-designations (again, with a concise basis for the objection, like the Exhibit Chart).

The designation chart may be filed as a separate ECF document. If so, the proposed pretrial order shall indicate in this section that the designation chart will be filed on the docket simultaneously with the proposed pretrial order.

The parties should include any objected-to portions of the designated deposition testimony in the exhibit binders submitted to the Court, and upload them to the Box.com link.

10. *Motions in Limine.* As noted above, motions *in limine* will be filed separately. In the proposed pretrial order, each party must provide a list that briefly

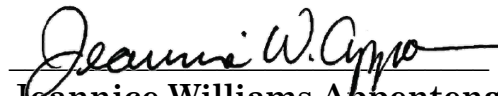
summarizes its motions *in limine* and indicates whether they are opposed. For example: “Defendant’s Motion *in Limine* No.1 to bar reference to Witness A’s drug use (Unopposed); Defendant’s Motion *in Limine* No. 2 to bar Witness B from trial (Opposed),” etc.

11. *Voir Dire Questions.* Judge Appenteng will always ask routine biographical questions. Any additional questions sought by the parties must be listed in the proposed pretrial order, divided into (a) agreed-upon questions and (b) proposed questions to which one party objects. A short basis for any objection should accompany the list. Each side is limited to 10 proposed disputed questions, unless a motion is filed before the pretrial conference that explains good cause for proposing more than the limit.

12. *Jury Instructions / Verdict Forms.* The parties must meet and confer to attempt to agree on as many jury instructions and verdict forms as possible. Where applicable, the Court generally prefers the Seventh Circuit’s Pattern Instructions. The proposed jury instructions must state, on an instruction-by-instruction basis, the following information: the proponent of the instruction, the legal authority for the instruction, and whether there is an objection to the instruction. If an instruction is disputed, the proponent of the instruction should concisely explain the basis for the instruction, if more explanation is required beyond the identified legal authority. Moreover, if an instruction is disputed, the objecting party must concisely state—on the page immediately following the instruction—the grounds for the objection, as well as any proposed modification or alternative. The same principles apply to proposed verdict forms. The proposed pretrial order shall indicate in this section that the proposed jury instructions and verdict forms will be filed on the docket and submitted in Microsoft Word by email to Proposed\_Order\_Appenteng@ilnd.uscourts.gov, simultaneously with the proposed pretrial order.

13. *Signature.* The proposed pretrial order must be signed (electronically) by counsel for each party.

SO ORDERED.

  
Jeannice Williams Appenteng  
United States Magistrate Judge

**Dated: April 28, 2026**