



MAGISTRATE JUDGE KARYN L. BASS EHLER
219 South Dearborn Street
Courtroom 1386
Chambers 1366
Chicago, Illinois 60604
(312) 435-5707

**STANDING ORDER FOR PREPARATION OF PROPOSED FINAL PRETRIAL ORDER
FOR CIVIL CONSENT CASES BEFORE JUDGE KARYN L. BASS EHLER**

A final pretrial conference will be held prior to trial. The purpose of this conference is to avoid surprises and to simplify the trial. At the conference, Judge Bass Ehler 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.

In preparation for the final pretrial conference, the parties shall jointly prepare and submit a Proposed Final Pretrial Order containing the below listed items by email to Chambers_BassEhler@ilnd.uscourts.gov in Word format with all counsel included as cc: recipients. The subject line of the email should include the case number, case name, and title of the submission. The Proposed Final Pretrial Order (excluding copies of exhibits and deposition transcripts) must also be filed on the docket in CM/ECF. In addition, two courtesy copies organized in a manner that is conducive to facilitating the Court's review of the materials must be delivered to Chambers. The Court will set a date for filing the Proposed Final Pretrial Order.

Contents of the Proposed Final Pretrial Order

1. Individuals present for trial. A list of all attorneys trying the case, including their business and cell phone numbers and email addresses. A list of the names of all paralegals, consultants, and parties who will be sitting at counsel table should also be provided.
2. Jurisdiction. A concise statement of the basis for federal subject matter jurisdiction, and if jurisdiction is disputed, the nature and basis of the dispute.

3. Proposed Statement of the Case. A concise joint statement of the claim(s) of the plaintiff(s), defense(s) of defendant(s), and all counterclaims and cross claims and the defenses to them. In a jury trial, this statement will be read to the jury during voir dire.
4. Relief sought. An itemization of the damages and other relief sought, and a concise explanation of the evidentiary basis for each itemization.
5. Contested Issues. A concise, numbered list of the contested issues of fact and/or law.
6. Witnesses. Separate lists for plaintiff(s) and defendant(s) of the names of all witnesses (including expert witnesses) and their role in the case: (a) who will be called; (b) who may be called; and (c) whose deposition or other prior testimony will be used. In a jury trial, this list will be read to the jury during voir dire. Other than witnesses called solely for impeachment, witnesses not listed in the Pretrial Order will be precluded from testifying absent a showing of good cause for the failure to disclose the witness or if all parties consent.
 - a. Depositions. For any witness testimony proposed to be offered by deposition, the parties shall jointly submit to Chambers by email the deposition transcript(s) with the proposed designations from each party highlighted in different colors and shall also deliver two courtesy copies of the highlighted transcript(s) to Chambers. The deposition transcripts should not be filed on CM/ECF with the Proposed Pretrial Order. The parties shall also jointly submit to Chambers by email a joint chart containing any objections to designated testimony by page and line number and the basis for the objection, as well as the opposing party's response to such objections. The basis for an objection and the response shall be stated as succinctly as possible with appropriate citations to evidentiary rules or case law. Objections not made in the joint chart will be deemed waived absent a showing of good cause.
7. Exhibits. Each party shall submit to Chambers by email with all counsel included as cc: recipients a chart of all exhibits the party may introduce at trial, as well as any demonstrative exhibits, including a trial exhibit number, the date of the exhibit, a brief description of the exhibit, a concise statement of the basis for any objection to admission of the exhibit, and a concise statement of the asserted basis for admissibility. Exhibits that will be used for impeachment purposes only need not be included in the exhibit list. The parties shall stipulate to the authenticity of exhibits whenever possible. Objections not made in the Pretrial Order will be deemed waived. The parties shall also submit two courtesy copies of the exhibits to Chambers. The exhibits should not be filed on CM/ECF with the Proposed Pretrial Order.
8. Proposed voir dire questions. For a jury trial, Judge Bass Ehler often uses a written questionnaire as the initial basis for voir dire. Counsel will be given copies of the completed questionnaires before jury selection begins. In addition to those questions, any proposed *voir dire* special to the case as well as any objection to that question should be included in the Proposed Final Pretrial Order. Each side is limited to 10 proposed disputed questions.

A motion must be filed before the pretrial conference to show good cause for additional proposed questions beyond that limit.

9. Proposed jury instructions / verdict forms. For a jury trial, the parties are directed to meet and agree on proposed jury instructions and verdict forms to the maximum extent possible and to file the jury instructions and verdict forms with the Proposed Final Pretrial Order, noting any objections as needed. The parties should also jointly submit proposed jury instructions and verdict forms to Chambers by email with all counsel included as cc: recipients. The parties should concentrate their efforts on the substantive jury instructions related to the merits of the case. The proposed jury instructions must state, on an instruction-by-instruction basis, the proponent of the instruction, the legal authority for the instruction, any objection to the instruction, the basis for the objection, and any proposed modification or alternative instruction. The same principles apply to proposed verdict forms. Judge Bass Ehler refers to the Seventh Circuit Pattern Jury Instructions, and where applicable those instructions should be used absent a good reason for not doing so.
10. Stipulations. A listing of any stipulations agreed to by the parties, including stipulations regarding the presentation or admissibility of evidence.
11. Settlement status. A statement summarizing the current status of settlement negotiations.

Motions *in limine*

The Court will set a separate schedule for the filing of motions *in limine* when it sets dates for the filing of the Proposed Final Pretrial Order. Judge Bass Ehler discourages the filing of “boilerplate” motions *in limine* or motions that address matters not in dispute. The parties must meet and confer on all motions *in limine* before filing any such motion.

Absent prior leave of court, each side is limited to a total of five (5) motions *in limine*.

Date: 5/28/26



Karyn L. Bass Ehler
United States Magistrate Judge