

Pretrial Proceedings

i. JFPTO: Pursuant to [E.D. Mich. LR 16.2](#), the court requires the Joint Pretrial Order to be filed one week before the final pretrial conference. Witnesses may be added to the JFPTO only by agreement or by motion.

ii. Final pretrial conference: This conference is typically held in chambers off the record two to six weeks before trial.

iii. Trial adjournments: Trial adjournments are seldom granted, and counsel are expected to resolve any possible date conflicts immediately upon the issuance of the scheduling order or to arrange for another member of the firm to conduct the trial.

iv. Settlement and Alternative Dispute Resolution: The court encourages the parties to agree to participate in alternative dispute resolution, including, e.g., non-binding facilitative mediation, and adopts a flexible approach in matching cases with appropriate means of resolution. If the parties sign a [Stipulated Request for Case Evaluation](#) under the Michigan sanctions protocol, the court will refer the case to case evaluation under the Michigan rules. In nearly all jury cases, the court will inquire as to the position of the parties with respect to their settlement positions, and will often actively facilitate negotiations. Settlement conferences are routinely combined with the final pretrial shortly before the trial month approaches; earlier settlement conferences may be held upon request. In non-jury cases, another judicial officer or an outside mediator may be enlisted to assist the parties in settlement discussions.

v. Exhibits: The court requires that exhibits be exchanged prior to trial and that they be marked by counsel with separate numbers for Plaintiff (usually beginning with 101) and Defendant (usually beginning with 501). Counsel will retain custody of exhibits during trial and pending appeal. A bench book of exhibits must be supplied for the court. There is no special form for motions *in limine* but such motions must be filed by the final pretrial and are decided before trial to the extent possible.