

It is hereby ordered:

1. All pleadings, motions, applications, briefs and any and all other papers in this case shall be e-filed with the civil clerk's office, located in the Monterey Courthouse. A courtesy copy shall be mailed or emailed to the Complex Litigation judge, via the judge's clerk.
2. All motions and briefs shall conform to California Rules of Court, including rule 3.1113, and indicate on the caption page that this matter has been deemed Complex and is assigned for all purposes to the Complex Litigation Judge.
3. As to any and all motions or other matters requiring a hearing or settlement conference, the date shall be obtained directly from and approved by the Complex Department, prior to the filing of the moving papers or other initial filings. All hearings will be on a Tuesday at 9:00 a.m. Counsel must attempt to stipulate to the date for the hearing. The hearing should be at least one week after the last paper is due.
4. The Case Management Conference will be held in Department 13, located at 1200 Aguajito Road, Monterey, California.
5. Counsel for all parties shall meet and confer on all matters set forth in California Rules of Court, 3.750 and 3.724(8).
6. In preparation for the Case Management Conference, counsel for the parties should file a joint written Case Management Conference Statement five (5) days before the CMC. The Case Management Statement must not be the standardized Judicial Council form. It must be in prose and detail. The Case Management Statement must include the following:
 - a. Status of Pleadings;
 - b. Status of Discovery;
 - c. Status of Settlement or Mediation;
 - d. Conclusions reached after meet and confer on all matters set forth in CRC Rule 3.750 and Rule 3.724(8);
 - e. Anticipated motions;
 - f. Request for next CMC date
 - g. Any other matters for which the parties may need court rulings or scheduling.

Counsel must be present and prepared to discuss these issues at the Case Management hearing. Counsel may seek permission to participate by Court Call.

7. During discovery, counsel should consider designating each exhibit with one number, to be used by all parties, for all uses, including depositions, motions, and trial. Alternatively, have one side use (for example) numbers 1 – 1000 and the other side use numbers 1001 through 2,000, in order to eliminate the use of letters.
8. The court will consider flexible alternatives to costly litigation, such as
 - a. Severing an issue for a bench trial (with or without stipulated facts). In this way the parties can resolve a disputed fact. This may assist the parties in resolving the case;
 - b. Informal discovery resolution;
 - c. Early motions in limine to narrow the issues. The goal would be to allow the parties to defer expensive discovery issues and proceedings.