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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SACRAMENTO

No. SSC-24-6

**STANDING ORDER OF THE  
SACRAMENTO SUPERIOR COURT**

**GENERAL COMPLEX CASE  
STANDING ORDER**

**IT IS HEREBY THE ORDER OF THIS COURT:**

1. The Court orders the parties to meet and confer in good faith at least 30 calendar days prior to all CMCs pursuant to California Rules of Court, Rule 3.724. Ideally, the meet and confer should occur in person or by video conference to allow for a meaningful back-and-forth discussion about the issues outlined in Rule 3.724 and 3.750, with particular attention to the following, as applicable:

- a. Generally, what facts and issues are in dispute;
- b. Pleading and service issues, including:
  - i. Whether all parties named in the complaint or cross-complaint have been served, have appeared, or have been dismissed;
  - ii. Whether any additional parties may be added or the pleadings may be amended;
  - iii. The deadline for the filing of any remaining pleadings and service of any additional parties;

- 1 c. The impact of any related cases and/or other matters (e.g. bankruptcy proceedings),  
2 and whether severance, consolidation, or coordination with other actions is desirable;
- 3 d. The possibility of early settlement, including:
- 4 i. Whether private mediation is appropriate;
  - 5 ii. Proposed mediators and available dates for mediation; and
  - 6 iii. Whether the parties agree to informally exchange discovery in advance of  
7 mediation;
- 8 e. Discovery issues, including, for example:
- 9 i. The general subjects on which discovery may be needed;
  - 10 ii. A proposed discovery schedule that avoids duplication;
  - 11 iii. Whether discovery should be stayed until all parties are brought into the case  
12 (or for any other reason);
  - 13 iv. Whether discovery should be conducted in phases or be limited to or focused  
14 on particular issues;
  - 15 v. Any issues related to preserving discoverable information and the need for  
16 preservation notices;
  - 17 vi. Any issues about disclosure, discovery, or preservation of electronically  
18 stored information, including the form or forms in which it should be  
19 produced and possible allocation of costs, as well as whether it may be  
20 appropriate to adopt a Protocol for Discovery of Electronically Stored  
21 Information
  - 22 vii. Any issues related to privacy, confidentiality, and/or trade secrets, and  
23 whether to stipulate to a Protective Order to facilitate the exchange of  
24 information and documents that may be subject to these limitations;
  - 25 viii. Any issues about claims of privilege;
  - 26 ix. Anticipated depositions and the subjects to be addressed in each deposition;
  - 27 x. The method for exchange of documents and whether to establish an electronic  
28 document depository;
  - xi. Any anticipated discovery motions;
- f. The schedule for motion practice and trial, including anticipated dates for:
- i. Discovery motions
  - ii. Dispositive motions

- iii. Class certification
- iv. Settlement conference
- v. Pre-trial conference
- vi. Trial

g. Issues related to counsel, including:

- i. Whether to appoint liaison or lead counsel;
- ii. Whether to establish a case-based Web site and other means to provide a current master list of addresses and telephone numbers of counsel;
- h. Whether the parties have consented to electronic service in this action pursuant to California Code of Civil Procedure section 1010.6.
- i. Whether a special master should be appointed and the purposes for such appointment; and
- j. Any other relevant case management issues.

2. A joint Case Management Conference Statement must be filed no later than 15 calendar days prior to all CMCs. All matters discussed during the meet-and-confer session shall be itemized and reported in the joint CMC Statement. Individual statements will not be considered. Do not use Judicial Council Form CM-110 for the joint CMC Statement. The purpose of the joint statement is to require counsel to confer. It shows the Court that the parties have been in direct communication. The CMC Statement shall include a declaration that the parties have met and conferred in good faith on all appropriate subjects set forth under #1. If no meet-and-confer session occurs, or if some of the issues under #1 are not discussed, the parties shall provide the Court with a brief and reasonable explanation.

3. Counsel for each party and each self-represented party who appears at the CMC shall be thoroughly familiar with the case, and must be prepared to discuss and commit to the party's position on the issues outlined in #1 above.

4. Should the parties stipulate and request a continuance of the CMC, they shall make the request in their CMC Statement with the heading "CONTINUANCE REQUESTED" on the front page. They shall outline the reasons for the request and provide at least three agreeable Fridays at 10:30 a.m. for the continued CMC. The Court may or may not approve the stipulated request. If the Court grants the request, the order will be reflected in the Court's tentative ruling. Alternatively, if the parties are seeking an earlier ruling on the request for continuance, they may submit a separate Stipulation and Proposed Order to the Court for its consideration.

1           5.       If this is a construction defect case, Counsel shall prepare a master case list that includes  
2 the following information: (a) name of each party and the complaint(s) to which they are a party; (b) the  
3 names and contact information of their respective counsel; (c) the status of the party (e.g., served,  
4 appeared, settled, dismissed, etc.); and (d) any other information pertinent to case management. The  
5 parties shall attach an up-to-date master list to all Joint Case Management Statements, Notices of  
6 Settlement, and Requests for Dismissal filed in this case. This will assist the Court in keeping track of  
7 the active parties and claims.

8           6.       Tentative Rulings: The Court may or may not issue a tentative ruling prior to the  
9 scheduled hearing. Counsel shall check the Court's tentative rulings after 2:00 p.m. the court day prior  
10 to the scheduled hearing. Tentative rulings are posted in the case on the public portal. You must have an  
11 account on the public portal to access the case. *It is imperative for the parties to review the tentative*  
12 *ruling in its entirety.* The ruling may include important updates for the parties, including possible  
13 updates to the date/time of the CMC. The parties shall be prepared to address all issues outlined in the  
14 Court's ruling. If no tentative ruling is posted, the hearing will proceed as scheduled. If a tentative  
15 ruling is posted and the Court indicates that no appearance is required, the ruling shall become the final  
16 order of the Court, and no hearing shall occur unless the party seeking a hearing contacts the department  
17 clerk by 4:00 p.m. on the court day preceding the hearing and advises the clerk that they have provided  
18 notice to all other parties. In such event, the hearing will proceed as scheduled or as otherwise indicated  
19 by the Court in its tentative ruling.

20           7.       **The Complex Civil Case Department provides information to assist you in**  
21 **managing your complex case on the Court website at [https://www.saccourt.ca.gov/civil/complex-](https://www.saccourt.ca.gov/civil/complex-civil-cases.aspx)**  
22 **civil-cases.aspx. This includes the Department's most current standing orders. The parties shall**  
23 **review this website regularly to stay abreast of the most recent complex civil case procedures and**  
24 **standing orders. Please refer to the website before directly contacting the Court Clerk for**  
25 **information.**

26           8.       Law and Motion: Pursuant to Local Rule 2.30, et seq., this case is assigned to the  
27 designated complex department for all purposes. The assigned department shall hear all law and motion  
28 matters.

          9.       Reserving Hearing Dates: Hearing dates for all motions must be reserved in advance by  
          emailing the assigned department. The requesting party shall meet and confer with all other parties to  
          identify mutually agreeable dates for the hearing before emailing the assigned department with the  
          hearing reservation request. The requesting party shall copy all parties on the email to the Court. The

1 email shall include the following information: (1) the case number; (2) the type of motion; and (3) at  
2 least three Friday dates at 9:00 a.m. that work for all parties. A motion filed without a reserved hearing  
3 date will be rejected.

4 10. Motions for Class Action and/or PAGA Settlement Approval: The Court has provided  
5 specific direction on the information and argument the Court requires to grant a motion for preliminary  
6 and final approval of a class action and/or a motion for approval of a PAGA settlement. All parties shall  
7 carefully review the Checklist for Approval of Class Action Settlements and fully comply with each  
8 applicable item to ensure a prompt ruling from the Court. Moving counsel must attest that they have  
9 reviewed the checklist and that their briefing complies with the checklist. Failure to do so will result in  
10 the denial of the motion without prejudice pursuant to Local Rule 2.99.05.

11 11. Informal Discovery Conferences (“IDCs”): The Court strongly encourages parties to  
12 request an IDC with the Court before reserving a hearing date for any discovery motion. The Court  
13 further encourages civility and cooperation in scheduling an IDC, including by agreeing to extend the  
14 time to file a discovery motion to allow time for an IDC. If a discovery motion is filed without  
15 scheduling an IDC, it is likely that the Court will order one before hearing the motion to “expedite the  
16 case, keep costs reasonable, and promote effective decision making by the court, the parties, and  
17 counsel.” (California Rules of Court, Rule 3.400.) During an IDC, the Court will meet informally with  
18 the parties to try to resolve the dispute. The process is designed to benefit all parties by saving costs and  
19 avoiding delay. The following procedures apply to IDCs:

- 20 a. Counsel must complete all meet and confer obligations either in person, by phone, or  
21 by video conference at least one week before scheduling a discovery conference.
- 22 b. To schedule an IDC, the prospective moving party must contact the department clerk  
23 by email with the subject line, “IDC REQUEST.” The email shall copy all parties and  
24 include a meet-and-confer declaration as described in Code of Civil Procedure section  
25 2016.040. The declaration shall also be filed with the Court.
- 26 c. Before emailing the IDC request to the Court, the prospective moving party shall  
27 have met and conferred with the opposing party to identify dates and times in the next  
28 30 calendar days when all concerned parties are available for a Zoom IDC  
conference. Counsel and/or parties with full authority to resolve the discovery issue(s)  
must appear at the IDC unless excused by the Court.
- d. If the Court is in session and does not grant, deny, or schedule the party’s request  
within 10 calendar days after the initial request, the request shall be deemed denied. If

1 the Court grants the request, the Court will issue a minute order advising counsel of  
2 the time and date of the Zoom conference.

- 3 e. At least three court days before the scheduled IDC, counsel shall file a joint letter  
4 outlining the discovery dispute, not exceeding 5 pages, single-spaced. No additional  
5 documents shall be attached to the letter. A courtesy copy with the subject line  
6 “JOINT LETTER” shall be emailed to the assigned department.
- 7 f. Unless otherwise indicated by the Court, the minute order granting an IDC will toll  
8 the deadline for filing the discovery motion. The deadline shall be tolled until such  
9 time as the Court issues a direction or order setting a new deadline for filing a  
10 discovery motion.
- 11 g. The outcome of an informal discovery conference does not bar a party from filing a  
12 discovery motion or prejudice the disposition of a discovery motion.
- 13 h. The Court will not tolerate efforts by the parties to rely on IDCs to resolve every  
14 minor discovery dispute that should otherwise be resolved through good faith meet  
15 and confer efforts. Should any party abuse the IDC process, the Court will consider  
16 issuing sanctions under California Code of Civil Procedure section 2023.010, et seq.

17 12. Discovery Disputes during Depositions: If a dispute arises during a deposition that  
18 requires judicial input to resolve, the parties may contact the Court immediately via the assigned  
19 department telephone number. If the parties cannot reach their assigned department, they may contact  
20 the other complex department.

21 13. PAGA Early Evaluation Conferences: This section only applies to PAGA actions  
22 commenced on or after June 19, 2024, as per Labor Code, § 2699.3(g)(1). PAGA actions filed before  
23 June 19, 2024, are not entitled to an Early Evaluation Conference (“EEC”).

- 24 a. A request for an EEC pursuant to Labor Code section 2699.3 is made by filing the  
25 request as a separate pleading. A courtesy copy of the request must also be emailed or  
26 delivered to the department where the matter is assigned. If a courtesy copy of the  
27 request is emailed, the subject line of the email must state in all capitalized letters:  
28 “REQUEST FOR PAGA EARLY EVALUATION CONFERENCE.” No proposed  
order is necessary. The Court will issue its own order that meets the requirements of  
Labor Code section 2699.3.
- b. The Parties may propose a private neutral outside of the court to conduct the EEC. If  
the Parties have selected a private neutral, the requesting defendant must provide the

1 following in the EEC request: (1) the name of the private neutral; (2) information  
2 related to the private neutral's knowledge and experience with issues arising under  
3 the Labor Code; and (3) the date the private neutral will hold the EEC. If a private  
4 neutral is not proposed by the Parties, or if the Court does not approve the Parties'  
5 proposed neutral, the Court will assign a Department other than the home Department  
6 to conduct the EEC.

- 7 c. For EECs that are conducted by the court, the confidential statements and supporting  
8 evidence described in Labor Code sections 2699.3(f)(3)(B), (C), and (E) shall be  
9 submitted by email or lodged submission only to the department in which the EEC is  
10 calendared. The materials emailed or lodged shall be clearly marked  
11 "CONFIDENTIAL MATERIALS RELATED TO PAGA EARLY EVALUATION  
12 CONFERENCE. NOT TO BE FILED." The confidential statements and supporting  
13 evidence may not be filed, and the court will not accept them for filing. For EECs that  
14 are conducted by a private neutral, the Parties shall follow the procedures set by the  
15 neutral for submitting the confidential materials related to the EEC.

16 14. Filings: All filings shall be filed (1) via e-Filing following the guidelines at  
17 <https://www.saccourt.ca.gov/civil/e-filing.aspx>, (2) at the Civil Filing Counter located in the Gordon D.  
18 Schaber County Courthouse, 720 9th Street, Room 102, Sacramento, CA 95814, or (3) placed in a  
19 Gordon D. Schaber Civil Drop Box. Courtesy copies shall be emailed directly to the assigned  
20 department.

- 21 a. The following documents shall be filed directly in the assigned complex department:  
22 i. Post trial motions, oppositions, and replies  
23 ii. Documents for trial  
24 iii. Final pretrial readiness conference statements  
25 iv. Class action and PAGA requests for dismissal

26 15. Ex Parte Applications: For ex parte applications, the applicant shall first call the  
27 courtroom clerk at the department phone number to reserve a hearing date and time for the ex parte  
28 application. Ex Parte hearings are typically scheduled for 8:30 a.m. but may be scheduled at different  
times to accommodate the Court's schedule. Ex parte applications shall be filed as described in the  
Filings section above. When emailing the courtesy copy to the department, please include "EX PARTE  
HEARING REQUEST" in your subject line.

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2 16. Typical Case Progress:

- 3 a. After the initial CMC or a subsequent CMC, the Court may or may not issue a formal  
4 *Case Management Order* (“CMO”). In lieu of a formal CMO, the Court may issue  
5 minute orders after CMCs addressing case management topics. The breadth of such  
6 orders may vary depending upon factors such as the complexity of the case and other  
7 circumstances. The Court may issue subsequent CMOs potentially addressing topics  
8 such as discovery cut-offs, phased discovery, disclosure dates, timing of private  
9 mediation, timing of class certification motions, etc. In some cases, CMOs may be  
10 proposed by an appointed special master or referee with case management authority.  
11 b. Pursuant to the Presiding Judge’s Notice and Order of Complex Case Determination,  
12 this Court is the trial department for this case. This Court remains the trial court  
13 unless subsequently ordered otherwise. In rare instances, a case may be transferred to  
14 Department 47 for assignment to a different trial department if this Court has  
15 scheduling conflicts due to another trial or otherwise is unable to proceed with trial.  
16 c. The Court will issue a minute order setting the Mandatory Settlement Conference in  
17 Department 59, a Final Status Conference, a Final Pre-Trial Conference, and the trial  
18 date. The minute order will also address deadlines for trial-related tasks and filings,  
19 including motions in limine, witness and exhibit lists, proposed jury instructions, jury  
20 questionnaires, etc.

21 17. The following interim orders shall be in effect:

- 22 a. Plaintiff(s) shall diligently locate and serve each defendant. It is the Court’s  
23 intention, by this order, that all parties shall be served in sufficient time to have made  
24 an appearance within the time allowed under law prior to attending the first CMC.  
25 b. Counsel shall continuously ensure that they have no legal conflicts of interest as to  
26 any present or anticipated parties so that counsel may participate fully in the CMC  
27 and this case.

28 18. The Court strongly encourages the parties to engage in early and meaningful alternative  
dispute resolution.

19. Uncivil or unprofessional behavior will not be tolerated. The Court expects the parties to  
be familiar with and follow the California Guidelines of Civility and Professionalism (available at  
<https://www.saccourt.ca.gov/local-rules/docs/guidelines-civility-professionalism.pdf>) and the

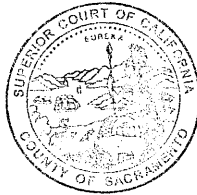


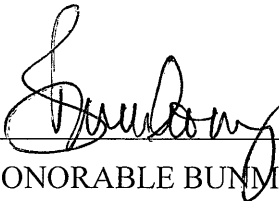
1 Sacramento County Bar Association Standards of Professional Conduct (available at  
2 <https://www.saccourt.ca.gov/local-rules/docs/standards-professional-conduct.pdf>).

3 20. The Court expects parties to resolve all disputes regarding scheduling or time extensions  
4 without the necessity of Court involvement.

5 This Order shall remain in full force and effect until further notice (or until rescinded, revoked, or  
6 superseded).

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8 DATED: 12/19, 2024



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THE HONORABLE BUNMI O. AWONIYI  
Presiding Judge