

IN THE STATE COURT OF PAULDING COUNTY
STATE OF GEORGIA

STANDING ORDER FOR ALL CIVIL CASES
INSTRUCTIONS TO PARTIES AND COUNSEL

This case has been assigned to Judge Angela R. O’Conor. The purpose of this Order is to inform the parties and their counsel of the Court’s policies, practices and procedures. This Order is issued to promote the just and efficient administration of this case. This Order, in conjunction with Georgia uniform State Court Rules and the Georgia Civil Practice Act, will govern this case.

All pleadings or other documents required to be filed in your case must be submitted to the Clerk of State Court via Peachcourt (www.peachcourt.com) or addressed as follows:

**Paulding County Clerk of State Court
280 Constitution Boulevard, Room 1023
Dallas, GA 30132**

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PAULDING COUNTY, GA
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SHEILA BULLER, CLERK
PAULDING COUNTY
SUPERIOR/STATE COURT

1. Contacting Chambers

Parties to civil actions, nor their counsel, should discuss the merits of a case with any member of the Judge’s staff. Courtesy copies of Motions, Conflict Letters or any other required correspondence to chambers may be addressed to Judge O’Conor as follows:

**Judge Angela R. O’Conor
State Court of Paulding County
280 Constitution Boulevard, Room 3132
Dallas, GA 30132**

Legal Assistant

Lisa Blalock (770) 443-7536 Lisa.Blalock@paulding.gov

Staff Attorney

Sarah Parsons (770) 443-7536 Sarah.Parsons@paulding.gov

Court Reporter

Amanda Bilbrey (770) 443-4536 Amanda.Bilbrey@paulding.gov

2. Extensions of Time

The court is responsible for the efficient processing of cases towards prompt and just resolutions. Only *reasonable* motions for extension will be granted upon a showing of good cause or by consent of all parties. The Court's deadlines are firm.

3. Conferences

Conferences for scheduling, discovery, pre-trial and settlement motions promote the efficient and just resolution of cases. Accordingly, the Court encourages the parties to request a conference when they believe they have a specific goal and agenda for the conference. Request for a conference are to be sent to Ms. Blalock for scheduling. The request must include a proposed agenda.

4. Candor in Responsive Pleadings

Pursuant to O.C.G.A § 9-11-8(b), responsive pleadings must admit or deny the averments of the adverse party's pleading.

5. Consent Motions

All Consent Motions must include a proposed order to be considered. The Court may request that any proposed Orders be submitted in Microsoft word format.

6. Discovery

A. Motions to Compel Discovery

The Court encourages the parties to confer with each other in good faith to resolve discovery disputes. In the event that the filing of a motion to compel is considered, the movant should contact Ms. Parsons and notify her of the discovery dispute. Ms. Parsons will schedule a conference call or a meeting in which the Court will attempt to resolve the matter without the necessity of a formal motion. Post-Judgment discovery will not be subject to this order.

B. Service of Discovery prior to the conclusion of the discovery period

All discovery requests must be served early enough so that the responses are due on or before the last day of the discovery period.

C. Extensions of Discovery Period

Motions requesting an extension of the discovery period must be made 15 days prior to the conclusion of the discovery period.

7. Motions for Summary Judgment and Daubert Motions

All Motions for Summary Judgment and Daubert Motions should be filed within 30 days of the close of discovery.

8. Alternate Dispute Resolution/Mediation

Parties will be asked as to the likelihood of settlement throughout the course of the case. Parties may be required to participate in alternate dispute resolution upon the Court's order at any time prior to the issuance of a Pre-Trial Order. Should the Court issue an order for mediation, the parties, counsel and their client must attend. If the client is an entity, then an officer of the entity with authority to bind the entity will be ordered to attend.

9. Pre-Trial Orders and orders from the Court

All parties will submit a consolidated Pre-Trial Order. The statement of contentions in the Pre-Trial Order governs the issues to be tried. The plaintiff should make certain that all theories of liability are explicitly state as well as the type and amount of each type of damage sought. The specific actionable conduct should be set out, and, in a multi-defendant case, the actionable conduct of each defendant should be identified. The defendant should explicitly set out any affirmative defenses upon which it intends to rely at trial. Counterclaims are subject to the same requirements state above.

Each party should identify exhibits and witnesses with specificity. It is not sufficient to include boiler plate language cover groups of potential witnesses, such as "all individuals identified during discovery". Instead, witnesses to be called at trial must be identified by **name**. Failure to identify a witness, including expert witnesses, by name in the consolidated pretrial order may result in the exclusion of the undisclosed witnesses' testimony from trial. In listing witnesses or exhibits, a party ma not reserve the right to supplement his list, nor should a part adopt another party's list by reference. Witnesses and exhibits not identified in the Pre-Trial Order may be excluded, unless it is necessary to allow them to be introduced to prevent a manifest injustice.

The following shall be added to all Consolidated Pre-Trial Order submissions at paragraph 14(c)

Medical Records introduced under O.C.G.A § 28-8-803(6): All medical records a party intends to introduce under O.C.G.A. § 28-8-803(6) must be specifically identified as such in the Consolidated pretrial Order. Upon notification that a party intends to introduce medical records under O.C.G.A. § 28-8-803(6), an opposing party **shall have 30 days** to file a request for the production of such documents. Upon receipt of such request for production, the party seeking to introduce medical records under O.C.G.A. § 28-8-803(6) **shall produce such medical records within 15 days** of receipt of a request for production.

Supplementation of Document Lists: Any party may supplement its list of physical or documentary evidence **no later than 90 days prior to trial with adequate notice to opposing counsel and leave of Court.**

All order from the Court shall be served to parties on a case via Peachcourt, First Class Mail or Email and pursuant to O.C.G.A §15-7-5.

10. Motions in Limine

Parties are limited to ten (10) contested Motions in Limine per side, unless the Court agrees to a larger number. Submission in excess of ten (10) contested Motions in Limine shall be denied and reserved as objections for trial. Should parties agree to file Consolidated Motions in Limine, there is no limit to the number of Motions filed by the parties.

A. Jury Trial

All Motions in Limine shall be due no later than 10 days prior to the date the trial is scheduled to begin. Argument on contested motions shall only be upon request of both parties or at the Court's discretion. In such an event, parties will file a Rule Nisi to schedule a hearing prior to the date of trial.

B. Bench Trial

All Motions in Limine shall be dispensed with at the date of the trial, unless parties anticipate that substantial argument is needed. In which case, the parties shall notify the Court if any Motions in Limine are expected to require substantial argument. In such an event, parties will file a Rule Nisi to schedule a hearing prior to the date of trial.

11. Jury Charges

All Jury Charges shall be submitted to the Court no later than ten (10) days prior to the scheduled calendar date for the trial. These may be request in Microsoft Word format. The original request must be filed with the Clerk of Court. Pattern charges should be requested by number and title and may all be listed on one page. All non-pattern charges shall be numbered consecutively on separate pages and provided for in Uniform State Court Rule 10.3. Non-pattern charges must contain citation of authority in support of the charge.

12. Court Reporter

This Court has a dedicated Court Reporter. If a case is on a Civil calendar the Court will provide a Court reporter. The Parties should notice the Court 5 days prior to the hearing date when possible of their intent to use the Court Reporter's services. Each of parties will be responsible for the costs of take down and transcription. If a party chooses not to participate in the costs of

take down, that party will not be able to order a copy of the final transcription. Payment for take down is due to the Court Reporter at the conclusion of the hearing each day.

13. Appeals from Magistrate

This Court, having the responsibility to investigate appeals from Magistrate Court under a de novo standard of review, and desiring to resolve the matters presented by the parties in a timely manner, shall review cases assigned to it pursuant to the following rules:

A. Discovery Period

The discovery period shall be limited to four (4) months from the date of the acceptance of the case with the Clerk of State Court.

B. Jurors for Trial

Pursuant to O.C.G.A. §15-12-122 all cases appealed from Magistrate Court that request a trial by Jury shall be limited to a 6-person jury. No jury trial shall be had with a 12-person jury except by leave of court.

14. Sanctions

Any violation of this Order may expose a party or its counsel to sanctions by this Court.

SO ORDERED, this 19 day of October, 2022



Angela R. O'Connor, Judge
State Court of Paulding County