

PRACTICE STANDARDS – CRIMINAL CASES

Judge Nina Y. Wang
United States District Court
District of Colorado

Alfred A. Arraj United States Courthouse
901 19th Street, Courtroom A-902
Denver, Colorado 80294-3589

Email: Wang_Chambers@cod.uscourts.gov
Telephone: 303.335.2600

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I. GENERAL PROCEDURES

A. Applicable Rules

1. Those appearing in the District Court must know and follow:
 - a. The Federal Rules of Criminal Procedure;
 - b. The Federal Rules of Evidence;
 - c. The Local Rules of Practice of the United States District Court for the District of Colorado;
 - d. The Electronic Case Filing Procedures (Criminal Version 3.0 or the most recent version); and
 - e. These Practice Standards.

Failure to comply with these rules, procedures, or standards may result in appropriate sanctions.

B. Communications with Chambers

1. Chambers staff cannot give legal advice or grant oral requests over the telephone, so please do not contact Chambers about substantive matters. For procedural information or assistance regarding a case, please contact Chambers at Wang_Chambers@cod.uscourts.gov or at 303.335.2600. The opposing counsel or the opposing pro se party must be included in all communications to Chambers.
2. For information about filing documents electronically, please contact the ECF Help Desk at cod_cmecf@cod.uscourts.gov or at 303.335.3433.

C. Citations

1. Citations shall be made pursuant to the most current edition of *The Bluebook: A Uniform System of Citation*.
2. Specific references in the form of pinpoint citations should be used to identify relevant excerpts from a document (e.g., to ECF page numbers or paragraph numbers). Whenever practicable, a citation to an unpublished opinion should include its Westlaw citation.
3. These standards should be cited as NYW Crim. Practice Standard, Part, Section, Subsection, Paragraph, and Subparagraph (e.g., NYW Crim. Practice Standard § III.F.1.a).

D. Proposed Orders

1. All unopposed motions, with the exception of motions for an ends-of-justice continuance, to reschedule a hearing, or to restrict a document, shall include a proposed order as an attachment to the motion. The proposed order should also be submitted via email to Wang_Chambers@cod.uscourts.gov in editable Microsoft Word format.

II. COURTROOM PROCEDURES

A. Courtroom Operations

For information regarding the courtroom, including telephonic or video connection, courtroom equipment and technology, courtroom protocol, use of deposition transcripts, the submission of trial exhibits and witness lists, and the use of exhibits at trial, please contact the courtroom deputy, Emily Buchanan, at Emily_Buchanan@cod.uscourts.gov. The courtroom is equipped with HDMI and VGA plug-ins for displaying exhibits. In addition, there are monitors at each table including the witness stand, large screens for the gallery, white pads, easels, and an ELMO.

Please contact Ms. Buchanan at least **fourteen days** prior to the hearing or trial with any questions regarding remote witnesses (if allowed by the Court), submission of trial exhibits and witness lists, use of exhibits at trial, general courtroom procedures, and to schedule a technical walk-through, if needed.

B. Recording of Proceedings

The realtime reporter assigned to the Court is Darlene Martinez. She may be contacted at Darlene_Martinez@cod.uscourts.gov. Transcripts of court proceedings may be ordered from Ms. Martinez. Requests for realtime, daily, or hourly copies must be made at least **thirty days** before trial. For further details, please contact Ms. Martinez.

C. Courtroom Decorum

Creating a courtroom where all parties, witnesses, and counsel feel welcome and respected is of utmost importance to this Court. In that regard, counsel are invited and encouraged to identify the preferred pronouns of counsel, clients, and witnesses at the earliest juncture possible. This may be done in an initial signature block, in person at a conference or hearing, or in a witness list. Should the wrong pronoun be used, counsel are encouraged to bring that to the Court's attention at the time, or through a subsequent email to Chambers.

Counsel should bring any accessibility or disability accommodation issues to the attention of the courtroom deputy prior to any hearing or trial so the Court can ensure that all necessary accommodations are in place.

All parties should observe the following courtroom decorum: stand when the Judge enters or leaves the courtroom, when addressing the Court, and when the jury enters or leaves the courtroom; request permission to approach the bench; address the Judge as “Your Honor”; and refer to all other persons by their surnames, prefaced by the individual’s title (e.g., Dr., Agent, Officer, etc.) and preferred pronouns.

D. Oaths

Please note and advise all persons appearing with you in court, including co-counsel, paralegals, clients, witnesses, and spectators that oath-taking is treated formally in the courtroom. The Court will administer an oath to a jury or witness ONLY when all other activity in the courtroom has ceased. Attorneys are directed to observe the administration of the oath and to stop all other activity.

III. MOTIONS PRACTICE

A. Page Limitations and Formatting Requirements

1. All papers filed with the Court shall be double-spaced and in an easily readable 12-point font.
2. All motions, objections, responses, and briefs shall not exceed **fifteen pages**. Reply briefs, when permitted, shall not exceed **ten pages**. These page limitations shall not include the cover page, table of contents, signature block, or certificate of service. The Court will entertain motions for extensions of the page limitation where appropriate and for good cause.
3. Motions and all supporting arguments should be contained in a single document. Exhibits to a motion, response, or reply must be filed on the same calendar day as the motion, response, or reply. Exhibits filed on a later day may be summarily stricken.

B. Motions to Continue or Reset

1. Requests to continue or reset a hearing or trial must be made via formal motion filed on the docket, except in exigent or unforeseen circumstances. Requests to continue or reset a hearing or trial should be made as far in advance of the setting as possible.
2. Motions to continue (including motions to vacate or reset) hearings and trials will be determined pursuant to *United States v. West*, 828 F.2d 1468,

1469–70 (10th Cir. 1987), unless a party seeks to continue a hearing or trial outside the Speedy Trial Act deadlines, in which case it will be decided pursuant to the Speedy Trial Act. Oral or written motions to continue should not be made at the time of a hearing or trial. Stipulations for continuances are not effective unless approved by the Court. When a motion to continue is granted, all parties will be notified as soon as practicable.

C. Motions for Extension of Time

1. An extension of time to file a document must be sought by way of an appropriate written motion filed as far in advance of the deadline as possible. The moving party should clearly set forth good cause for the requested extension with particularity.

D. Emergency Motions

1. Emergency motions are only those necessary to avoid imminent, irreparable harm. Counsel filing an emergency motion should ensure that: (1) the caption of the motion begins with the word “emergency”; (2) the motion is electronically filed using the CM/ECF drop-down menu option entitled “Emergency” on the docket text modification screen; and (3) Chambers is notified of the motion by email at Wang_Chambers@cod.uscourts.gov with a subject line containing “Emergency Motion” and the case name and number.

E. Ends-of-Justice Motions

1. All motions for an ends-of-justice continuance must:
 - a. Specify the date the requesting party believes the speedy trial clock expires;
 - b. Specify the specific number of days the party is seeking to exclude; and
 - c. Identify which parties join in the motion and which parties object to the motion.
2. Any party who objects to the granting of an ends of justice continuance must file their objection within **seven days** of the filing of the motion.

F. Objections to Rule 404(b) Notices

1. An objection to a Fed. R. Crim. P. 404(b) notice shall be filed no later than **seven days** after such Rule 404(b) notice was filed.

G. Motions In Limine

1. Motions in limine are strongly discouraged when the motion cannot be resolved until evidence is presented at trial. Instead, those evidentiary issues should be flagged in a trial brief.
2. If motions in limine are filed, they must comply with the following procedures:
 - a. Prior to filing a motion in limine, counsel shall confer with one another in an attempt to resolve the contested evidentiary issues. If they are unable to come to a mutual resolution, counsel shall then determine which party will file the motion on the particular evidentiary issue and which party will file the response.
 - b. Motions in limine must be filed **fourteen days** before the Trial Preparation Conference. Responses shall be filed **seven days** before the Trial Preparation Conference.
 - c. Unless otherwise ordered, each party shall be limited to one omnibus motion in limine.

IV. HEARINGS AND TRIALS

A. Trial Preparation Conference

1. The Trial Preparation Conference will be held approximately **seven days** before trial. Counsel who will try the case must attend.

B. Evidentiary Hearings

1. If the parties believe an evidentiary hearing on a motion is necessary, they shall email Wang_Chambers@cod.uscourts.gov no later than two business days after the motion is filed to set the hearing. Prior to emailing Chambers, the parties shall meet and confer to discuss the anticipated length of the evidentiary hearing and shall include the anticipated length in their email to Chambers.

C. Proposed Voir Dire Questions

1. The parties shall submit their respective proposed voir dire questions to the Court no later than **seven days** prior to the Trial Preparation Conference. The parties shall file their respective proposed voir dire questions via CM/ECF and shall send editable Microsoft Word versions to Wang_Chambers@cod.uscourts.gov. The parties shall be prepared to discuss their proposed voir dire at the Trial Preparation Conference.

D. Jury Instructions and Verdict Form

1. The parties shall submit their proposed jury instructions and proposed verdict form **seven days** prior to the Trial Preparation Conference, unless otherwise ordered. The parties shall jointly file their proposed jury instructions and their proposed verdict form (in separate filings) via CM/ECF and shall also jointly send an editable Microsoft Word version of each document to Wang_Chambers@cod.uscourts.gov.

2. Each proposed jury instruction must be submitted on a separate page, be numbered, and identify the source of the instruction and supporting authority. Whenever practicable and appropriate, the parties shall use or adapt for use the Criminal Pattern Jury Instructions prepared by the Criminal Pattern Jury Instruction Committee of the United States Court of Appeals for the Tenth Circuit. The pattern instructions and updates may be found online at <https://www.ca10.uscourts.gov>.

3. The parties must use their best efforts to stipulate to jury instructions. To the extent there are disputes with respect to proposed jury instructions, each party shall submit its own proposed jury instruction. In addition, for each disputed instruction, the parties shall jointly submit a single, redlined jury instruction in which they delineate the language they respectively propose. For example:

Defendant's Proposed Jury Instruction: You have heard evidence of other crimes engaged in by the defendant. You may consider that evidence only as it bears on the defendant's motive and for no other purpose.

The Government's Proposed Jury Instruction: You have heard evidence of other crimes engaged in by the defendant. You may consider that evidence only as it bears on the defendant's motive, **plan, knowledge, or absence of mistake**, and for no other purpose.

4. The parties shall meet and confer and stipulate to a proposed verdict form. The Court strongly encourages counsel to craft a stipulated verdict form that is readily understandable to laypersons.

E. Exhibits and Exhibit Lists

1. Exhibits

a. Prior to a hearing or trial, the parties shall jointly provide to the courtroom deputy a copy of all exhibits in a notebook format. This notebook will be used for the witnesses and/or the jury. For all trials, the exhibit notebook is due no later than **seven days** prior to the Trial

Preparation Conference, unless otherwise ordered. For all hearings, the exhibit notebook is due no later than **two business days** prior to the hearing, unless otherwise ordered.

b. In addition to submitting exhibit notebooks, the parties shall jointly provide to the courtroom deputy two flash drives that each contains a copy of all exhibits, numbered sequentially in the same numeric order used in the exhibit notebook. For all trials, exhibit flash drives are due no later than **seven days** prior to the Trial Preparation Conference, unless otherwise ordered. For all hearings, exhibit flash drives are due no later than **two business days** prior to the hearing, unless otherwise ordered.

c. The parties must stipulate to the authenticity and admissibility of as many exhibits as possible, marking the appropriate box on the proposed exhibit list. **The failure to appropriately stipulate to exhibits may lead to further conferences with the Court.** The parties' stipulation as to the admissibility of a document does not guarantee its admissibility; each document the parties intend to submit to the jury must be offered to and accepted by the Court.

d. The parties must pre-mark all exhibits that will be used or identified for the record. Exhibits not timely pre-marked or exchanged before a hearing or trial may not be admitted.

e. No oversized exhibits are to be used unless requested by prior motion and approved by the Court.

2. Exhibit Lists

a. For all evidentiary hearings and trials, the parties shall use the format for exhibit lists located on the District Court's website at <http://www.cod.uscourts.gov/JudicialOfficers/ActiveArticleIIIJudges/HonNinaYWang.aspx>.

b. For all trials, exhibit lists are due no later than **seven days** prior to the Trial Preparation Conference, unless otherwise ordered. The parties shall file their exhibit list(s) on CM/ECF and shall send an editable Microsoft Word version to Wang_Chambers@cod.uscourts.gov.

c. For all evidentiary hearings, exhibit lists are due no later than **two business days** prior to the hearing, unless otherwise ordered. The parties shall file their exhibit list(s) on CM/ECF and shall send an editable Microsoft Word version to Wang_Chambers@cod.uscourts.gov.

F. Witness Lists

1. For all evidentiary hearings and trials, the parties shall use the format for witness lists located on the District Court's website at <http://www.cod.uscourts.gov/JudicialOfficers/ActiveArticleIIIJudges/HonNinaYWang.aspx>.
2. For all trials, witness lists are due no later than **seven days** prior to the Trial Preparation Conference, unless otherwise ordered. The parties shall file their witness lists via CM/ECF and shall also jointly send editable Microsoft Word versions to Wang_Chambers@cod.uscourts.gov.
3. For all evidentiary hearings, witness lists are due no later than **two business days** prior to the hearing, unless otherwise ordered. The parties shall file their witness lists via CM/ECF and shall also jointly send editable Microsoft Word versions to Wang_Chambers@cod.uscourts.gov.
4. For each witness, please estimate the time for all examinations, e.g., direct and re-direct. For trials, **two days** after witness lists are filed, the parties shall file estimates of the time required for their cross-examination of the opposing party's witnesses. The Court will strictly enforce the estimated time allotted for each witness's testimony. The parties shall include the proposed order of witnesses, the anticipated length of testimony, and the expertise of any testifying experts.
5. On the morning of the first day of the trial or the evidentiary hearing, each party shall provide the courtroom deputy with four paper copies of a final list of its witnesses that includes an estimate of the time anticipated for each witness's direct and cross examination. One copy will be made available to the court reporter to assist in the transcription of court proceedings, so please be sure that names are spelled correctly.

G. Depositions

1. Together with Fed. R. Crim. P. 15, this Practice Standard governs the use of both regular and videotaped depositions in criminal proceedings.
2. If the parties intend to offer deposition testimony in lieu of a live witness at trial or at an evidentiary hearing:
 - a. No later than **twenty-one days** prior to the Trial Preparation Conference, the party offering such testimony must designate the deposition testimony and inform the opposing party whether the testimony will be read or presented from a video recording. The deposition designations should be provided to the opposing party but should not be filed on the docket.

b. Counter-designations must be made no later than **fourteen days** prior to the Trial Preparation Conference. The counter-designations should be provided to the opposing party but should not be filed on the docket.

c. The parties should be prepared to address any objections to deposition designations at the Trial Preparation Conference. Prior to the Trial Preparation Conference, the parties shall meet and confer regarding their designations and objections. After a good-faith meet and confer process, the parties shall identify any remaining objections by page and line citation and jointly submit a chart that sets forth (1) the page and line citations of the deposition testimony subject to objection; (2) an explanation for each objection; and (3) any relevant or supporting case law. The objection chart shall be filed on CM/ECF and submitted to Wang_Chambers@cod.uscourts.gov no later than **seven days** prior to the Trial Preparation Conference. In addition, no later than **seven days** prior to the Trial Preparation Conference, the parties shall jointly submit a copy of the deposition transcript(s) to Wang_Chambers@cod.uscourts.gov.

i. Transcripts submitted to the Court should have each party's designations highlighted in a different color, with a clear legend of the designated colors.

3. To accommodate evidentiary objections to deposition testimony presented by video, the proponent must have the technical ability to "mute" excluded responses and efficiently "fast forward" to the next segment of testimony. Otherwise, the deposition testimony will be read into the record.

4. For jury trials, if evidence will be presented through a written deposition transcript, the proponent shall supply a person to read from a written deposition transcript in a non-argumentative fashion. The Court does not permit attorneys of record to read deposition transcripts into the record.

5. For bench trials, depositions will not usually be read in open court. Instead, the Court will read them in chambers in any requested sequence. At the beginning of the trial, the offering party shall provide the courtroom deputy with two copies of the relevant deposition transcript marked as an exhibit, with each party's designations highlighted in a different color, with a clear legend of the designated colors.

H. Trial Briefs

1. Trial briefs are encouraged but are not required absent a specific Court order. If filed, trial briefs shall not exceed **ten pages** and shall be filed no later

than **seven days** before trial. Please flag evidentiary issues in a trial brief rather than by motion in limine. A trial brief may not be used as a substitute for a motion.

I. Jury Trials

1. Counsel shall be present no later than **8:30 a.m.** each day during the trial to discuss any last-minute trial matters. Trial days will typically begin at 9:00 a.m. and end at 4:00 p.m., with a fifteen-minute break in the morning, an hour break for lunch, and a fifteen-minute break in the afternoon. However, counsel and witnesses should be aware that the general schedule may be modified to promote the efficiency of the trial.
2. Jury Selection and Voir Dire:
 - a. The Court will conduct voir dire of prospective jurors. Unless otherwise ordered, each side will then be permitted to conduct a voir dire examination of potential jurors for fifteen minutes after the Court has completed its voir dire examination.
 - b. After voir dire is complete, the Court will entertain challenges for cause. If any prospective jurors are struck for cause, the Court will conduct voir dire of any replacement juror(s). Each side will be permitted three peremptory strikes.
 - c. Challenges pursuant to *Batson v. Kentucky*, 476 U.S. 79 (1986), and its progeny shall be made and considered at the time challenges for cause are made, before the jury is sworn. A party wishing to preserve a *Batson* challenge should ask the Court to not release any jurors subject to the challenge.
3. Jurors will be permitted to take notes during the trial.
4. After the close of evidence but before closing arguments, the Court will read the jury instructions to the jurors. Each juror will be given a copy of the jury instructions for use during deliberations.
5. Opening Statements and Closing Arguments:
 - a. Opening statements will generally be limited to **thirty minutes** per party. Should the parties believe that they require more time, the parties should be prepared to discuss their request at the Trial Preparation Conference. Typically, only one attorney per party will be permitted to make opening statements, unless the Court finds good cause to permit otherwise. The courtroom deputy will provide a five-minute warning before time expires if requested by counsel.

b. After the close of evidence, the Court will inform the parties how much time will be allotted for closing arguments. Typically, only one attorney per party will be permitted to make closing arguments, unless the Court finds good cause to permit otherwise. Counsel for each party should inform the courtroom deputy whether counsel would like a warning before their time expires. Should the government wish to reserve any time for rebuttal, counsel must make the request prior to beginning closing arguments.

J. Bench Trials

1. Trials to the Court will begin at **8:30 a.m.** on the first day of trial.
2. Generally, the Court will permit no more than **fifteen minutes** for opening statements and **thirty minutes** for closing arguments. To the extent that the parties agree, they may substitute a written submission of no more than **ten pages** in lieu of closing arguments.
3. No later than **three business days** before the Trial Preparation Conference, the parties shall submit Proposed Findings of Fact, Conclusions of Law, and Orders. A Joint Proposed Findings of Fact, Conclusions of Law, and Orders shall be submitted that reflects stipulated facts and/or law to which the parties agree. Each party may then file separate proposed Findings of Fact, Conclusions of Law, and Orders with respect to any disputed points. The proposed Findings of Fact shall include citations to the trial exhibits, and the proposed Conclusions of Law shall include legal citations. The documents shall be filed via CM/ECF and shall also be submitted as an editable Microsoft Word version to Wang_Chambers@cod.uscourts.gov. The parties are expected to present their proposed findings of fact in the same order as the anticipated order of proof at trial.
4. For a trial to the Court, a proper résumé or curriculum vitae, marked as an exhibit, generally will suffice for the qualification of an expert witness.

K. Glossary

1. Not later than **five business days** before trial, the parties shall submit a glossary of any difficult, unusual, scientific, technical, and/or medical words, names, terms, or phrases. The glossary shall be submitted via email to Wang_Chambers@cod.uscourts.gov.
2. The parties shall submit to the courtroom deputy three paper copies of the glossary and provide a copy of the glossary to opposing counsel and any pro se party on the day of trial.

L. Sentencing Hearings

1. The Court generally does not permit witnesses to speak on behalf of the defendant at a Sentencing Hearing. Individuals wishing to speak on behalf of the defendant may submit letters and other materials for consideration through defense counsel no later than **three business days** before the Sentencing Hearing.
2. To the extent victim testimony is anticipated at the Sentencing Hearing, the Assistant United States Attorney shall provide a list of those individuals to Chambers via email at Wang_Chambers@cod.uscourts.gov no later than **three business days** before the Sentencing Hearing. Victims may also submit letters and other materials for consideration through the United States Attorney's Office no later than **three business days** before the Sentencing Hearing.

V. PLEA AGREEMENTS

A. Notices of Disposition

1. Any notice of disposition filed pursuant to D.C.COLO.LCrR 11.1(a) will be construed as a pretrial motion within the meaning of 18 U.S.C. § 3161(h)(1)(F) for the purpose of computing time under the Speedy Trial Act.

B. Rule 11(c)(1)(C) Pleas

1. Plea agreements made pursuant to Fed. R. Crim P. 11(c)(1)(C) are generally disfavored.
2. Any plea agreement under Fed. R. Crim P. 11(c)(1)(C) must be submitted to Chambers no later than **fourteen days** before the date set for trial.

C. Plea Agreement Content Restriction

1. No plea agreement shall identify whether a defendant has agreed to cooperate with the United States or other jurisdiction with respect to the investigation or prosecution of others.
2. Consequently, no plea agreement shall contain any reference to any cooperation agreement between the defendant and the government, to any potential for a motion under 5K.1.1 of the United States Sentencing Guidelines or to any other statutory or guideline calculation or adjustment predicated on such cooperation.

D. Change of Plea Hearings

1. The Assistant United States Attorney who negotiated the plea agreement (unless no longer employed as an AUSA) and defense counsel who reviewed the plea agreement with the defendant must attend the Change of Plea Hearing.
2. The parties shall send courtesy copies of the plea documents to Wang_Chambers@cod.uscourts.gov no later than **three business days** before the Change of Plea Hearing, unless otherwise ordered. The courtesy copies of the plea documents need not be signed.
3. Pursuant to D.C.COLO.LCrR 11.1(e), defense counsel shall submit the signed original and one copy of the plea agreement and the defendant's statement in advance of plea of guilty to the courtroom deputy at the time of the hearing.

TABLE OF PRE-TRIAL/TRIAL DEADLINES

Note: This table is provided for the convenience of parties appearing before Judge Wang. It does not include all the dates and deadlines listed within the Court’s Criminal Practice Standards and is not a substitute for knowledge of and familiarity with the text.

Deadline	Days Prior to/After	Practice Standard
Prior to Evidentiary Hearing		
File exhibit list and witness lists.	2 business days	§§ IV.E.2.c, F.3.
Submit exhibit notebook and exhibit flash drives to the courtroom deputy.	2 business days	§ IV.E.1.a–b.
Prior to Change of Plea Hearing		
Submit courtesy copies of plea documents.	3 business days	§ V.D.2.
Prior to Sentencing Hearing		
Submit letters or other materials on behalf of the defendant.	3 business days	§ IV.L.1.
Submit list of victims expected to speak at Sentencing Hearing.	3 business days	§ IV.L.2.
Submit letters or other materials from victims for consideration in sentencing.	3 business days	§ IV.L.2.
Prior to Trial Preparation Conference		
File motions in limine.	14 days	§ III.G.2.b.
File responses to motions in limine.	7 days	§ III.G.2.b.
Exchange designations of deposition testimony.	21 days	§ IV.G.2.a.
Exchange counter-designations of deposition testimony.	14 days	§ IV.G.2.b.
Submit unresolved deposition objections.	7 days	§ IV.G.2.c.
File proposed jury instructions and verdict form.	7 days	§ IV.D.1.
File proposed voir dire questions, exhibit list, and witness lists.	7 days	§§ IV.C.1, E.2.b, F.2.

For trials, file estimates of the time required for cross-examination of witnesses.	2 days after witness lists are filed	§ IV.F.4.
Submit exhibit notebook and exhibit flash drives to the courtroom deputy.	7 days	§ IV.E.1.a–b.
File Proposed Findings of Fact, Conclusions of Law, and Orders <i>for bench trial</i> .	3 business days	§ IV.J.3.
Prior to Trial		
Request realtime, daily, or hourly transcripts from the court reporter.	30 days	§ II.B.
File trial briefs.	7 days	§ IV.H.
Submit glossary of any difficult, unusual, scientific, technical, and/or medical jargon, words, names, terms, and/or phrases.	5 business days	§ IV.K.
Submit final witness lists to the courtroom deputy.	Morning of the first day of trial	§ IV.F.5.