

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

Judge Celia Gamrath

Calendar 6 - Courtroom 2508

Telephone: (312) 603-4890

<http://www.cookcountycourt.org/JudgesPages/GamrathCeliaG.aspx>

Chambers Email: ccc.chancerycalendar6@cookcountyl.gov

STANDING ORDER

I. COVID-19 REMOTE COURTROOM PROCEDURES

A. ZOOM MEETING ID: 928 4730 2982

B. ZOOM MEETING PASSWORD: 411367

C. Call-In: +1 312 626 6799

Pursuant to General Administrative Order 2020-02, given the risks posed by COVID-19, Judge Gamrath will **conduct business remotely** as much as possible. All court calls, with limited exceptions, shall be conducted digitally via Zoom at the above meeting ID or, alternatively, telephonically upon request. Participants must be **muted with video on** until instructed otherwise by Judge Gamrath.

The remote appearances will be conducted according to the court's normal schedule outlined below in Section II(C). Contested motions, hearings, pretrial settlement conferences, and trials shall be set separately by the court. **Do not appear in person in the courtroom unless specially ordered to do so by the court.**

Agreed Orders are encouraged in lieu of appearing remotely. To submit Agreed Orders, please send them in Word format to the court's email address at CCC.CHANCERYCALENDAR6@COOKCOUNTYIL.GOV.

If participants are late to their scheduled court date and time, the court retains the right to strike said date, DWP, or default the parties as the court finds appropriate. The remote court call is open to the public. Any member of the public may use the above meeting ID to observe, however, the court retains the discretion to remove any disruptive participants.

II. GENERAL MATTERS

A. Court Reporters and Interpreters

Participants must provide their own court reporter if they wish to have one or if the court requires one. Participants shall make advance arrangements with the court if they need an interpreter or special accommodations. **Video recording, audio recording, photographing and/or reproducing of the livestream is prohibited except as allowed by the Illinois Supreme Court Rules.**

B. Communications

All communications with the court should be by the filing of pleadings, motions, applications, petitions, briefs, legal memoranda, etc., and providing courtesy copies to the court via email. Communications with law clerks is allowed only on administrative and scheduling matters via telephone or email. **Parties are responsible for tendering proposed Orders via email within 3 hours of their court appearance.**

C. Court's Schedule

9:00 a.m.	Clerk Status (law clerks only)
9:15 a.m.	Regular Motions (spindled through the clerk's office)
9:45 a.m.	Case Management and Court Status
10:30 a.m.	Contested Motions, Hearings, Settlement Conferences, Trials (as set)
1:00 p.m.	Contested Motions, Hearings, Settlement Conferences, Trials (as set)

III. AGREED ORDERS

A. Procedure

A proposed Agreed Order may be submitted electronically via email at any time. Ordinarily, the court will enter Agreed Orders as a routine matter without a court appearance. Parties may not agree to briefs that exceed the page limits absent leave of court. Parties are encouraged to send proposed Agreed Orders on routine matters such as motions for leave to file an appearance or answer; motions to issue alias summons or appoint a special process server; motions for voluntary dismissal, motions for extension of time to respond to pleadings or discovery, etc.

B. Agreed Protective Orders

Parties may agree to protective orders, but they may not agree to file documents under seal without presenting a motion. Such motions may be granted only in limited circumstances upon good cause shown. Before presenting such motions, parties shall seek to agree on redactions that will allow documents to be filed in the public court record. If agreement is not possible, the party wishing to file a confidential document under seal must seek leave of court.

IV. MOTIONS

A. Courtesy Copies

Courtesy copies of a notice of motion and the motion must be delivered to the court electronically via email at least three business days prior to the presentment date. Parties may deliver a notice of motion and the motion by sending them via email, with exhibits, to the email address above. All notices of motions shall provide notice that the proceeding will be held by Zoom video and telephone conferencing. **A Zoom meeting ID, password, and call-in number shall be set forth in the notice of motion.** (Zoom information listed above.)

B. Regular Motions

1. Procedure. The regular motion call is at 9:15 a.m. A regular motion may be scheduled on the Chancery Division's docket electronically. File-stamped courtesy copies of the motion and notice of motion must be sent to the court via email at least three business days before the motion's presentment date.

2. Discovery Motions. Discovery motions must contain a **specific statement** as to the efforts undertaken by the parties under Illinois Supreme Court Rule 201(k) and shall clearly identify the **specific discovery items** outstanding or sought to be compelled. The court may resolve discovery motions on the day the motion is presented and not set a briefing schedule. Proposed Agreed Orders on reasonable discovery extensions are encouraged.

C. Contested Motions That Require Briefing

1. Briefing Schedule. The court's form order should be used for a briefing schedule on a contested motion. The form order includes a date for a clerk status. At the clerk status, held at 9:00 a.m. on Wednesdays, a hearing date on the motion will be set if the court deems appropriate. It is imperative that the movant provide the court with file-stamped copies of all relevant pleadings, papers, and substantive case law prior to the clerk status. The motion will be stricken if the movant fails to appear for the clerk status.

2. Briefs/Supporting Memoranda:

a) **Format.** All briefs must be double-spaced with 12-point font and at least 1-inch margins.

b) **Length.** Memorandum in support of and in opposition to a motion shall not exceed 15 pages. Reply briefs shall not exceed 8 pages. These limitations do not include exhibits.

c) **Citation to authority.** All citations to authority should comply with Illinois Supreme Court Rule 6 and The Bluebook and should be to official reporters; parallel citations are unnecessary.

d) **Exhibits.** All exhibits to motions must be page numbered or Bates-stamped, tabbed and sub-tabbed.

e) **Insurance Contracts.** If an insurance contract is at issue, the movant (or the insurance company on cross-motions) must provide the court with Bates-stamped copies of the insurance contract. All references to the insurance contracts shall be to these Bates-stamped copies. Failure to pinpoint specific pages of the insurance contract may result in the striking of a brief and require the refile of it to comply with this provision.

f) **Administrative Review.** A copy of the administrative record shall

be provided to the court electronically.

3. Hearings. Hearings on contested motions are scheduled usually at 10:30 a.m. and 1:00 p.m. Hearing dates are firm.

D. Emergency Motions

1. Procedure. Emergency motions must be scheduled by the court's law clerks in Courtroom 2508 no later than 10:00 a.m. on the day before desired presentment. The movant shall present the motion, relevant pleadings and papers, and affidavit or verified complaint stating the basis for the emergency. If the matter is a true emergency, an immediate hearing date will be set and movant shall provide notice to the opposing parties or their counsel.

2. True Emergencies. Generally, a true emergency exists only where: (1) there was no opportunity to notice a motion for the regular motion call; and (2) without immediate court action, there will be irreparable and imminent damage to a party. Matters that have become urgent by reason of a party's failure to seek timely relief are not emergencies.

3. Temporary Restraining Orders. Motions for a TRO shall be presented according to the emergency motion procedures. The movant shall provide advance notice of the motion and service of a verified complaint and affidavit to the defendant(s), unless they waive service. If necessary to effectuate service, the movant may seek leave to use a special process server when scheduling a TRO. A TRO without notice may be allowed only in extreme situations if it clearly appears from the specific facts shown by affidavit or the verified complaint that immediate, irreparable injury, harm or loss will occur before notice can be served and a hearing had thereon.

E. Motions for Default

1. Presentment of Motion. Default motions may be presented at either the regular motion call (9:15 a.m.) or case management and status call (9:45 a.m.). All parties who have been served must be given notice without regard to whether an appearance or answer has been filed. The following materials are required for a default motion:

- (1) Copy of Motion and Notice of Motion, as provided by Circuit Court Rule 2.1;
- (2) Face of summons;
- (3) Affidavit or certificate of service of summons, as provided by 735 ILCS 5/2-203;
- (4) Attorney or self-represented litigant certificate certifying that the defendant has not filed an appearance or answer; and
- (5) Military affidavit, per 50 U.S.C. app. §521.

2. Prove-Up. Once a default motion is presented, the court will schedule a separate prove-up date. A copy of the order scheduling a date for prove-up must be sent to the defaulting party, along with the proposed judgment. The only exception to this two court-date requirement is if a plaintiff seeks to enforce an administrative order, in which case the court may allow prove-up on the same day as presentment of the default motion.

F. Motions for Summary Judgment.

No motion for summary judgment may be filed once a trial date is set, absent leave of court.

G. Motions to Reconsider.

Litigants contemplating a motion to reconsider should have the pertinent standard in mind. No oral argument will be heard unless requested by the court.

V. CASE MANAGEMENT AND COURT STATUS CALLS

Case management and court status calls are conducted at 9:45 a.m. An initial case management is set automatically by the Court Clerk's office and notice will be mailed by postcard or sent electronically. At the first appearance for any case, the parties should be prepared to submit electronically courtesy copies of their pleadings, *e.g.*, complaint, answer, affirmative defenses, cross-claims and counterclaims.

Counsel with authority to commit to all scheduling orders must be prepared to inform the court as to the status of service of process upon each defendant; settlement efforts; the complexity and nature of the litigation; the status of the pleadings; any pending or contemplated motions; and all contemplated and completed discovery. The court may enter orders relating to pleadings, compelling compliance with overdue discovery, and setting time limits for the conclusion of discovery. Failure to appear may result in a dismissal for want of prosecution, default, or other appropriate sanction.

All defendants who have been served are expected to participate without regard to whether they have filed a responsive pleading.

V. PRETRIAL

A. Settlement Conferences.

Upon agreement of the parties to participate in good faith settlement discussions, a settlement conference will be set by the court. The court's form order should be used and signed by all parties at the time the settlement conference is scheduled.

B. Final Pretrial.

All trials will be preceded by a final pretrial conference with the court. One week prior to the final pretrial, each party shall exchange and present the court with all "Trial Materials" enumerated below. If no final pretrial is scheduled, the trial materials shall be exchanged and presented to the court electronically one week prior to trial.

VI. TRIAL

A. Trial Materials.

Parties shall exchange and present the court with the following trial materials:

- (1) A joint statement of the nature of the case, issues in the case and agreed facts.
- (2) An exhibit list. Exhibits should be listed by the number the offering party intends to use at trial, and the parties should indicate any agreements as to foundation or admissibility.
- (3) A list of witnesses that the party may call at trial.
- (4) Copies of Illinois Supreme Court Rule 216 requests to admit and responses that the party may use at trial.
- (5) Copies of motions *in limine* and supporting and opposing memorandum.
- (6) Copies of evidence depositions if there are objections requiring rulings.

B. Trial Dates.

Trial dates are firm. Trials begin at 10:30 a.m. or 1:00 p.m.

DATED: July 1, 2020

ENTERED:

/s/ Celia Gamrath

Judge Celia Gamrath, #2031

Circuit Court of Cook County, Illinois

County Department, Chancery Division