

CIRCUIT COURT OF COOK COUNTY- CHANCERY DIVISION

JUDGE D. RENEE JACKSON

CALENDAR 11

STANDING ORDER

Richard J. Daley Center, Courtroom 2305

Telephone: 312-603-6034; 312-603-6035

Email: ccc.chancerycalendar11@cookcountyl.gov

Zoom information:

Zoom Meeting ID: **928 9663 2736**

Zoom Passcode: **813107**

This order outlines the general courtroom procedures for cases assigned to Calendar 11. The court may modify these procedures when necessary and appropriate.

This order supplements and should be read in conjunction with General Administrative Order 2023-05, **Resumption of Full Court Proceedings** (Amended), which describes procedures applicable to all cases in the Chancery Division.

All communications with the court must be made through the filing of pleadings, motions, applications, petitions, briefs, legal memoranda, *etc.* Direct communications with law clerks are permitted only for administrative and scheduling matters and **not on substantive legal issues or legal advice.**

SCHEDULE (as of April 1, 2025):

- **10:00 a.m.** Case Management and Motion Call
 - **10:00 a.m.** Emergency Motions unless otherwise directed by Calendar 11 Staff
 - **10:45 a.m.** Status Call
- Note: Filed Motions in cases set for status may be presented at this call.*
- **11:15 a.m./2:15 p.m.** Motions or trials scheduled by the court.

I. ZOOM PROCEDURES

- a. All participants are expected to participate with their cameras on throughout the entire court proceeding, even if your case is not currently being heard.
- b. Attorneys are to name themselves as follows: “Atty [LAST NAME] – [CASE NAME];” e.g., Atty Smith – Doe v. Doe.
- c. If a party is unable to sign on with video capabilities with a computer or cell phone, a party may come to the Daley Center and use the Zoom Room located on the Concourse level.

II. CASE MANAGEMENT CONFERENCES

- a. Upon filing a case, the Clerk’s office will automatically schedule an initial case management conference at **10:00 a.m.**, typically two months after the filing date. Unless

otherwise ordered, this hearing will be conducted via Zoom using the provided log-in information. Parties should prepare and submit courtesy copies of their pleadings (*e.g.*, complaint, answer, affirmative defenses, counterclaims, and cross-claims) via email **at least one week** before the conference. Failure to submit courtesy copies via email may result in a delay of the conference.

- b. Counsel with authority to commit to all scheduling orders must attend the case management conference and be prepared to update the court on:
- The status of service of process on each defendant
 - The nature of the litigation
 - The status of pleadings
 - Any pending or anticipated motions
 - The status of discovery, including contemplated or completed action

The court may issue orders concerning pleadings, compel compliance with overdue discovery, and establish time limits for the completion of written/or oral discovery.

- c. All defendants who have been served are expected to participate in the case management conference, regardless of whether they have filed a responsive pleading.
- d. Failure to appear for a case management conference may result in dismissal for want of prosecution, default, or other appropriate sanctions.

III. MOTIONS

Non-evidentiary hearings for Calendar 11 motions will be held via Zoom, while evidentiary hearings will typically take place in Courtroom 2305 unless otherwise ordered.

Regular Motion Call

- a. The court's regular motion call is at **10:00 a.m.** If a case is set for status at 10:45 a.m., parties may schedule a motion for presentment at 10:45 without seeking leave, effectively party "piggybacking" their motion onto a status hearing. **A regular motion must be spindled on the Chancery Division's electronic docket located in Room 802.** The clerk's office will provide all dates; please note that staff in Room 2305 cannot assist with scheduling regular motions.
- b. File-stamped courtesy copies of all motions under **twenty-five (25) pages** must be emailed to the court. For courtesy copies over twenty-five (25) pages, please email AND deliver hard copies tabbed and bound to Courtroom 2305 at least **seven (7) business days** before the presentment date. Failure to comply may result in the motion being stricken from the court's regular motion call and may not be heard by Judge Jackson. In such cases, the movant must re-notice and spindle the motion for a future date with the clerk's office.

- c. **Motions for Default** - All parties served must receive notice as per Circuit Court Rule 2.1, regardless of whether an appearance has been filed. A motion for default must include the following documents:

- A copy of the notice and motion
- The face of the summons
- A copy of the return of summons
- A certificate of the officer or an affidavit of the person who served the summons
- A certificate from the attorney or pro se litigant, confirming that the court file and docket have been checked for any appearance or answer filed by the defendant
- A military affidavit if defaulting an individual

Once a default order is entered, the court will schedule a prove-up hearing with notice. On the prove-up date, the plaintiff must provide affidavits or live testimony to substantiate their case. Courtesy copies of any prove-up affidavits and a draft judgment order must be submitted to the court at least *five (5) days* before the prove-up hearing.

- d. **Motions to File Under Seal & Protective Orders**

- Cannot be applied to all documents and/or pleadings.
- Must explicitly state that the protective order will not apply to court orders.
- The request must detail the privacy interests involved and justify the necessity of the protective order, supported by an affidavit.
- Motions to file under seal should include the redacted version as an exhibit.
- Courtesy copies of a motion to file under seal should include both redacted and unredacted versions, with the proposed redactions **clearly highlighted, as indicated here.**
- Parties involved in pending cases may submit an agreed protective order off-call, provided it complies with the requirements of this provision.
- All proposed protective orders must include the following language:

“The parties must seek leave of court to file documents or other materials containing Confidential Information under seal. To the extent possible, the parties shall redact Confidential Information from documents or other materials filed with the court so as to minimize requests to file under seal. If leave is allowed to file documents or other materials under seal, such documents or other materials shall be submitted in an envelope or other container labeled “CONTAINS CONFIDENTIAL INFORMATION – SEALED PURSUANT TO COURT ORDER” and including the caption of this action and a description of the nature but not the substance of the contents.”

- e. **Motions to Reconsider** - For any motion requiring the court to rule on prior briefings, such as a motion to reconsider, the movant must also provide courtesy copies of the previous briefs.
- f. **Motions for Alternative Service & Publication** – Any motion for alternative service or motion for publication are not considered routine motions and must be spindled on the Court’s docket through Odyssey or “piggy-backed.”

Emergency Motions & Temporary Restraining Orders

g. Emergency Motions

1. Scheduling: All emergency motions must be scheduled via email by one of the Calendar 11 law clerks. The party seeking to obtain a hearing on an emergency motion must contact Calendar 11 chambers after filing the same with the Clerk of the Circuit Court of Cook County by **sending an email** with a courtesy copy of the file-stamped motion, clearly marked “EMERGENCY MOTION,” along with all supporting documents, must be provided to the law clerk when scheduling the motion. Phone calls to the Calendar 11 law clerks is NOT required. Notice of the motion **should not** be sent to opposing parties until the court has confirmed scheduling.
2. Definition of Emergency: The court will assess the motion to determine whether it constitutes a genuine emergency. **According to General Administrative Order 2023-05, an emergency is defined as “matters involving sudden and unforeseen circumstances that may cause injury, loss of life or damage to property and that requires an urgent response and remedial action.”**
3. Representation Requirement: An attorney *with knowledge of the case* must be available when scheduling the emergency motion. Matters that have become urgent due to a party’s failure to seek timely relief do not constitute emergencies. If the motion does not adequately establish an emergency basis, the law clerks will decline to schedule it as an emergency. The motion may then be scheduled for the regular motion call through the Clerk’s office.
4. Notification: If the court accepts the motion for emergency scheduling, the movant shall be notified via email and is required to notify the opposing party as soon as possible, using the most effective means to ensure actual notice. Except in extraordinary circumstances, the court **will not** schedule an emergency motion with less than *24 hours notice*.

i. Temporary Restraining Orders (TRO) Motions for temporary restraining orders shall be submitted in accordance with the emergency motion procedures outlined above.

1. The court may conduct a TRO hearing *ex parte* only if it is evident from specific facts presented through affidavit or verified complaint that immediate and irreparable injury, loss, or damage will occur to the applicant before notice can be served and a hearing held (735 ILCS 5/11-101).
2. TRO motions must be accompanied by a verified complaint or an affidavit that complies with § 5/11-101.

Routine Motions / Orders

- ### h. Types of Motions: The following motions may be filed as routine motions and do not require spindling with the Clerk’s office:
- **Special Process Server**
 - See 735 ILCS 5/2-202.
 - **Motions with notice:**

- To vacate any and all technical defaults and for leave to file an appearance, motion, or answer.
 - For leave to appear as attorney or additional counsel.
 - To substitute one attorney for another by agreement.
 - For voluntary dismissal by plaintiff where no hearing or trial date is set and no dispositive motion has been filed.
- i. Submission Guidelines: Routine motions and orders will be accepted off-call Monday through Friday from 9:00 a.m. to 4:00 p.m. Parties must provide the court with:
- A copy of the file-stamped motion.
 - A notice of motion clearly designating it as routine.
 - A copy of the proposed order.

Courtesy copies of all motions under **twenty-five (25) pages** must be emailed to the court. For courtesy copies over twenty-five (25) pages, please email AND deliver hard copies tabbed and bound to Courtroom 2305.

- j. Objections: If the court receives an objection to a routine motion, the order will not be entered, and the parties will be notified. The motion must be spindled on the regular motion call.

IV. STATUS HEARINGS

After the initial court appearance, the court typically schedules a status hearing at **10:45 a.m.** All parties are expected to attend unless otherwise directed by the court.

The parties are to meet and confer, preferably by Zoom, fourteen (14) days in advance of any status dates.

V. BRIEFS

- a. Length and Format: Briefs and memorandums are limited to **fifteen (15) double-spaced pages**. Except reply briefs are limited to **seven (7) double-spaced pages**. Leave is required to exceed this page limit and the court may strike any filings that do so without permission. *Note*: It is improper to withhold case law support from an initial memorandum to present it for the first time in a reply brief.
- b. Citations: Citations to authority must comply with Illinois Supreme Court Rule 6 and the Bluebook, using official reporters. Parallel citations are unnecessary. Parties must include pin cites when applicable. As court personnel only have access to LEXIS, parties should provide copies of any cases cited in their memoranda that are **not** available from the official reporters or LEXIS.
- c. Insurance Contracts: If an insurance contract is at issue, the movant (or the insurance company on cross-motions) must provide Bates-stamped copies of the contract, including the application and any relevant certificates. All motions should reference these Bates-stamped copies and need not include the policy as an exhibit.

VI. HEARINGS ON CONTESTED MOTIONS.

- a. When setting a briefing schedule, the court typically requests that the movant submit a full set of courtesy copies upon completion of briefing. These copies may be submitted via email unless otherwise instructed and should include:
 - Motion, supporting brief, response brief, reply brief, and all exhibits (tabbed for physical copies and clearly marked for electronic versions).
 - Sur-response and sur-reply, and if applicable, along with all exhibits.
 - Most recent complaint.
 - All relevant pleadings.
 - The administrative record for administrative review cases.
- b. Hearing Dates: After receiving courtesy copies, a Calendar 11 law clerk will contact all parties to set a hearing date.
- c. Non-Responsive Parties: If the respondent fails to file a written brief in response to the motion, they will be deemed to have waived oral argument, and the court will schedule a ruling date.

VII. TRIALS

Trials are generally held in person in Courtroom 2305, which can accommodate witnesses testifying remotely.

Pre-Trial Conference

- a. When a trial date is set, a pre-trial conference will also be scheduled. During the pre-trial conference, the court will review trial materials, set a date to rule on motions in limine, and discuss trial logistics, including the number of witnesses and exhibits, and any other matters pertaining to trial (see below).

Trial Materials

- b. When setting the pre-trial conference, the court will establish a timeline for parties to submit trial materials.
- c. Parties are strongly encouraged to submit joint or agreed trial materials to the extent possible. **Separate submissions must include a statement detailing the good faith efforts made to agree on joint materials.** Required trial materials include:
 - A joint short statement outlining the nature of the case.
 - A list of all potential witnesses, indicating those who will and may testify for each party.
 - A comprehensive table of contents listing all exhibits each party intends to use at trial.
 - Exhibits should be page-numbered, tabbed, and presented in binders.
 - All exhibits shall be listed by the number that the party offering it intends to use at trial, and any stipulations or agreements as to foundations or admissibility. If no written objection is made as provided in this standing order, the exhibit(s) will be received in evidence without any further authentication or hearing as to relevance or any other issue.

- Copies of any Supreme Court Rule 216 requests to admit and responses thereto which any party anticipates using at trial.
- Copies of all motions in limine and supporting and opposing memoranda. Motions in limine must be discussed between and among counsel in advance of the pre-trial conference to ensure that the motions remaining are those that the parties in good faith cannot resolve before trial.
- An affidavit of compliance with all Supreme Court Rule 237 notices and a statement of all outstanding disputes regarding such notices.
- Parties expecting to offer opinion testimony shall tender responses to Supreme Court Rule 213 interrogatories (with any supplements) and/or deposition testimony that will support the opinion testimony to be offered at trial. If testimony is challenged at trial as not in compliance with Rule 213, the proponent will be expected to promptly locate the previous disclosure demonstrating compliance with the Rule's requirements.
- Evidence depositions, if there are objections requiring rulings.
- Copies of the most recent pleadings (*i.e.*, complaint, answer, counterclaim, third-party complaint with all exhibits attached, and so forth).

Motions to Continue Trial Dates

- d. Trial dates are firm. Requests to continue a trial date must be made in writing before the pre-trial conference, demonstrating good cause and supported by a detailed affidavit.

Interpreters

- e. Parties are responsible for providing their own interpreters. Indigent parties who cannot afford an interpreter should contact chambers at least twenty-one (21) days before the trial date to request assistance.

VIII. SETTLEMENT CONFERENCES

- a. Scheduling: Settlement conference may be ordered upon oral or written motion from a party. However, a settlement conference will not be scheduled until all parties complete and serve a form settlement conference worksheet, available on the court's website and in courtroom 2305. The worksheets shall not be filed with the clerk, but delivered to the court no later than fourteen (14) days before the status date set for the conference.
- b. Attendance: Counsel must have authority to settle the case and clients are expected to attend unless excused by the court. If the Court excuses the parties, the parties must be available by telephone.
- c. Conference Conduct: During the settlement conference, the court will discuss substantive matters relating to the case. Parties must execute a settlement conference stipulation and consent, available on the court's website. Ground rules will be provided on the day of the settlement conference.

IX. COURT REPORTERS

There is no court reporter assigned to Calendar 11. If a party wishes to have court proceedings transcribed, that party must provide their own court reporter at their own expense.