

GENERAL RULES FOR TRIALS BEFORE JUDGE GOODWIN

Please read carefully prior to trial.

1. The routine schedule for trial days will be as follows, unless expressly modified by the Court. All trial counsel shall be present at 9:00 a.m. and prepared to discuss any significant legal or evidentiary issues that are anticipated to arise that day. Presentation of evidence will occur over three uninterrupted sessions: 9:30 a.m. to 11:30 a.m., 12:30 p.m. to 2:30 p.m., and 3:00 p.m. to 5:00 p.m. These sessions may be extended based on the flow of the trial but will not be shortened. That is, counsel shall be ready to ask their first question as soon as the session starts and to call additional witnesses, as required, until the session ends.

2. The Court encourages counsel to present exhibits to witnesses and the jury electronically, with paper copies used only as backup. At docket call (or before if requested by the parties), a conference will be scheduled with counsel and Judge Goodwin's Courtroom Deputy to discuss available technology.

3. Immediately prior to the beginning of trial, each party shall submit to the Courtroom Deputy three sets of the party's (a) list of witnesses, (b) list of exhibits, and (c) exhibit notebooks. The exhibit notebooks shall consist of three-ring binders with a cover sheet reflecting the case number and sponsoring party. Each anticipated exhibit shall be marked numerically as set forth in the exhibit list and separated by tabs. The primary "record" set, which should include any original documents and be labeled with original document stickers, shall be maintained by the Courtroom Deputy throughout the trial and placed before testifying witnesses as needed. If the parties agree to an electronic presentation of exhibits, only one set of exhibit notebooks need be submitted.

4. When addressing the Court for any reason, please stand unless a physical disability prevents you from doing so.

5. Do not directly address the jury at any time other than opening and closing statements.

6. Do not discuss discovery disputes or raise legal motions in the presence of the jury.

7. Do not assert your personal opinion as to the credibility of a witness, the culpability of a civil litigant, or the guilt or innocence of an accused.

8. Do not assert personal knowledge of a fact in issue or state a fact not in evidence.

9. Do not signify your agreement or disagreement with any statement made by a party, witness, or other attorney, or any ruling of the Court. Advise your clients they are subject to this same limitation.

10. Opening statements generally will be limited to 15 minutes. When addressing the jury during opening, remain behind the lectern. Remember that the purpose of an opening statement is to give a concise summary of the facts that will be presented during trial.

11. When asking questions of a witness, remain behind the lectern. Except for children, address witnesses by their surnames, for example, Mr. A, Sergeant B, or Doctor C. Do not ask a witness to read a passage from a document—counsel may read short passages themselves or display longer passages as needed. Do not attempt to direct a witness to answer a question—if you believe an answer is unresponsive, make your objection and ask the Court for relief.

12. When making an evidentiary objection in the presence of the jury, do not argue the objection but state as concisely as possible the rule or legal ground on which you rely. If greater explanation is needed, ask to approach the bench.

13. When multiple attorneys are appearing on behalf of a party, one attorney should be assigned to each witness. Only that attorney may question the witness in direct or cross examination and only that attorney may raise or respond to an objection to the witness's testimony.

14. Closing statements generally will be limited to 25 minutes. When addressing the jury during closing, remain behind or within arm's length of the lectern. Do not appeal to any juror to view himself or herself in the position of a party.

15. Although water is provided, you may bring bottles of water – but not food or other beverages – into the courtroom. Use coasters. Clean your table at the end of each session.

16. If you have reason to anticipate that any question of law or evidence is particularly difficult, give the Court as much advance notice as possible.

Thank you for your cooperation.

CHARLES B. GOODWIN
United States District Judge