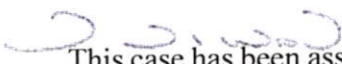


2024 NOV 12 A 9:57
AMENDED STANDING ORDER IN ALL CIVIL CASES
INSTRUCTIONS TO PARTIES AND COUNSEL


This case has been assigned to Judge Derek J. White. The purpose of this Order is to inform the parties and their counsel of the Court's policies, practice and procedure. It is issued to promote the just and efficient determination of the Court's caseload. This Order, in combination with this Court's Local Rules and the Georgia Civil Practice Act shall govern this case.

CASE ADMINISTRATION

1. Contacting Chambers

Lynette Clark, our Civil Case Manager, is your principal point of contact on matters relating to this case. Where possible, communication with Ms. Clark should be by telephone (912-652-7565) or by e-mail (lfclark@chathamcounty.org). Mailed, couriered, and hand delivered communications should be addressed as follows:

Ms. Lynette Clark Civil Case Manager
133 Montgomery Street
Suite 430
Savannah, GA 31401

Any documents required to be filed in this case should be addressed and delivered to the Clerk of State Court rather than Ms. Clark.

The Court's civil staff attorney is Alison Sawyer. She can be reached by telephone (912-652-7496) or e-mail (asawyer@chathamcounty.org). Neither the parties nor their counsel should discuss the merits of the case with Ms. Clark or Ms. Sawyer.

2. Courtesy Copies

Parties are not required to forward courtesy copies of motions and other filings directly to chambers. However, in large cases, courtesy copies of substantive motions are appreciated via email to Ms. Sawyer.

CASE MANAGEMENT

1. Extension of Time

The Court, along with counsel for the parties, is responsible for processing cases toward prompt and just resolutions. To that end, the Court seeks to set reasonable and firm deadlines. Motions for extensions, whether opposed, unopposed, or by consent, will be granted only upon a showing of good cause. In the event the parties need an extension of the discovery period past their second request, the Court requires that a proposed Consent Scheduling Order be filed contemporaneously with the motion. The motion should address all significant deadlines to be extended.

2. Conferences

Scheduling, discovery, pre-trial, and settlement conferences promote the speedy, just, and efficient resolution of cases. Therefore, the Court encourages the parties to request a conference when counsel believes a conference will be helpful and counsel has specific goals and an agenda for the conference.

3. Candor in Responsive Pleadings

In accordance with O.C.G.A. § 9-11-8 (b), a party's responsive pleading must admit or deny the averments of the adverse party's pleading. A party may not deny, in its responsive pleading, an averment in its opponent's pleading on the grounds that the averment raises a matter of law rather than fact.

4. Discovery Responses - Boilerplate and General Objections

Boilerplate objections in response to discovery requests are *strongly* discouraged. Parties should not carelessly invoke the usual litany of rote objections, i.e., attorney-client privilege, work-product immunity from discovery, overly broad/unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence unless the responding party has a valid basis for these objections.

Moreover, general objections are disfavored, i.e., a party should avoid including in its response to a discovery request a "Preamble" or a "General Objections" section stating that the party objects to the discovery request "to the extent that" it violates some rule pertaining to discovery, e.g., the attorney-client privilege, the work product immunity from discovery, the requirement that discovery requests be reasonably calculated to lead to the discovery of admissible evidence, and the prohibition against discovery requests that are vague, ambiguous, overly broad, or unduly burdensome. Instead, each individual discovery request should be met with every specific objection thereto - but only those objections that actually apply to that particular request. Otherwise, it is impossible for the Court or the party upon whom the discovery response is served to know exactly what objections have been asserted to each individual request. All such general objections will be disregarded by the Court.