

**Standing Order; Law Division, Trial Call #20**

Judge Frank J. Andreou  
Courtroom 2811, Chambers 2806  
50 West Washington Street,  
Richard J. Daley Center  
Chicago, IL 60602  
Chambers 312.603.7551  
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**Zoom Login: 859 5880 2564**  
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**I. Pretrial Settlement Conferences: Conducted Monday-Friday at 12:00 p.m. or 4:00 p.m.**

Pretrial settlement conferences are encouraged for any case even if the case has not been assigned to 2811. If the parties agree to conduct a conference in 2811, please enter a Transfer Order in 2005. The Order is preprinted and will transfer the case to 2811 for the limited purpose of the conference. All other dates will remain in effect, including any trial dates, discovery cutoff dates, etc. After the Order is entered, please email three agreed to dates to the above address and I will select and confirm the final date with you. All confidential pretrial settlement memoranda should be provided at least one week prior to the scheduled conference. A demand and counter must have been exchanged before we meet.

**II. Trial Assignments to Trial Call #20, Room 2811**

When assigned a trial in room 2811, please provide the following:

1. **Pleadings:** Copies of the most current Complaint and Answer, including any Counterclaims, Third-Party Complaints and Answers to those pleadings.
2. **A joint statement of the case:** The statement should be kept as generic as possible. It should also include a statement identifying the parties and their counsel. As the Statement is read to the jury, you will introduce yourselves and your clients to the jury.
3. **A witness list:** The witness list should include all may and will call witnesses so that the witness list can be read to the jury to see if any of the potential witnesses are known by any juror.
4. **An Exhibit List:** Each party must prepare an exhibit list. Please exchange your exhibit lists and discuss objections that you want addressed on the record. All foundation issues, etc. will be addressed before jury selection. Please note that publication of any exhibit to the jury will not be allowed without leave of court.
5. **Written Discovery Responses:** Copies of answers to 213(f)(1), (2) and (3) interrogatories along with any experts' written reports. Please also provide your respective responses to Rule 214 disclosures but please do not attach your disclosed documents.
6. **Discovery Deposition Transcripts:** Copies of all discovery deposition transcripts of any witness that will testify during the trial to enable the Court to follow along with any impeachment.

7. **Evidence Deposition Transcripts:** Copies of all evidence deposition transcripts. The parties should confer to address any objections raised and address those objections to which a ruling is required.

8. **Jury Questionnaires (optional):** If the parties are going to utilize a jury questionnaire, please provide a copy so that I can address any objections. Questionnaires can be very helpful during jury selection but are not required.

9. **Juror Questions during Trial:** The parties should discuss whether juror questions will be allowed during the trial.

10. **Preliminary Jury Instructions:** Please prepare IPI 1.01(a) and 1.08 instructions which will be read to the jury before opening statements. The remaining jury instructions will be discussed after the trial commences. The parties will meet with the Court on an agreed to time. The parties should confer before the final instruction conference to address which instructions will be contested.

11. **Motions in Limine:** Please provide your respective Motions *in Limine* along with exhibits. The parties should exchange their Motions ahead of the trial date so that we can dispose of the agreed Motions and only argue the contested Motions on the record. Each party must provide a written Order regarding the rulings on the Motions *in Limine* and I will refer to the Order if there is any objection based on one of my rulings.

12. **Sidebars are Disfavored:** Please note that sidebars during trial are disfavored by the Court so I like to address all evidentiary issues ahead of time. While sidebars are allowed, they are rare in my courtroom. Since we are imposing on the jurors' lives, I want to be respectful of their time, so I move the trial along quickly and efficiently without taking away from your ability to present your respective cases.

13. **Daily Schedule:** I begin each day at 9:30 a.m.; take a mid-morning break at 10:50 a.m.; break for lunch at noon until 1:30 p.m.; take a mid-afternoon break at 2:50 p.m. and terminate proceedings at 4:00 p.m. unless the parties have requested to stay later. I will ask the jurors to accommodate any later dismissals but need to give them advance notice to accommodate for child-care issues, transportation, etc. I also would like the parties to get back to their offices at a reasonable hour. I will stay as late as the parties wish; however, should the need arise. I also will work through lunch if necessary to keep the trial moving along.

14. **Anticipated Completion Date:** Please agree on an anticipated completion date and make sure that enough time is available for all parties to present their respective cases. Once I tell a jury a termination date it is etched in stone and will not be moved unless absolutely necessary. For example, if the jury requests more time for deliberations, I have no problem going over the allotted time. The termination date will be disclosed to the jury during the reading of the Statement of the Case.

15. **Jury Selection:** We will discuss jury selection when we meet.

### **III. Motion and Hearing Schedule**

Do not spindle Motions for 2811. If you do so, the Motion will appear on the assigned Motion Calendar. File the Motion and provide a notice with a date of your choosing. Motions are heard Monday through Friday at noon. Please provide me with a copy of the Notice and Motion. You can email me courtesy copies.

### **IV. Zoom**

All proceedings in my room are in person unless I specifically designate a hearing for Zoom. The Zoom login information is provided above.