

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION
MOTIONS SECTION

STANDING ORDER – CALENDAR “A”

Judge Barbara N. Flores

Richard J. Daley Center, 50 W. Washington St., Courtroom 2206, Chicago, IL 60602

Calendar “A” e-mail: law.calacc@cookcountyil.gov

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This standing order is designed to increase case management and motion practice efficiency in all cases assigned to Courtroom 2206 and is subject to revision. Parties should check for an updated Standing Order from time to time to ensure they are following the current order. The Standing Order should be read to be consistent with all Administrative Orders issued by the Chief Judge and the Presiding Judge of the Law Division, including [Law Division General Administrative Order \(GAO\) 20-9](#). Other GAOs can be found at cookcountycourt.org/about/orders.

I. GENERAL INFORMATION

All Calendar A proceedings are conducted *in person* in Courtroom 2206 unless the Court has specifically ordered otherwise. Zoom ID: 811 9576 3750 Password: 134562

II. SCHEDULE

	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
9:00 a.m.	<i>Motions</i>	<i>Motions</i>	<i>Initial CMC</i>	<i>Motions</i>	
9:30 a.m.	<i>Continued CMC</i>	<i>Continued CMC</i>	<i>Continued CMC</i>	<i>Continued CMC</i>	
10:00 a.m.	<i>Continued CMC</i>	<i>Continued CMC</i>	<i>Initial CMC</i>	<i>Continued CMC</i>	<i>Pre-trials</i>
10:30 a.m.	<i>Continued CMC</i>	<i>Continued CMC</i>	<i>Continued CMC</i>	<i>Continued CMC</i>	
11:00 a.m.	<i>Hearings/ Emergency Motions</i>	<i>Hearings/ Emergency Motions</i>	<i>Hearings/ Emergency Motions</i>	<i>Hearings/ Emergency Motions</i>	<i>Hearings/ Emergency Motions</i>
1:30 p.m.	<i>Hearings/ Pre-trials</i>	<i>Hearings/ Pre-trials</i>	<i>Hearings/ Pre-trials</i>	<i>Hearings/ Pre-trials</i>	

III. CASE MANAGEMENT

- A. Initial Case Management** – Newly filed cases are addressed pursuant to [Rule 218](#) with electronic notices sent to all attorneys and self-represented parties of record for the initial case management date, 60 days from the date of filing of the complaint.
- Be prepared to address: (1) whether the case is a re-filing (if so, it must be returned to the original calendar); (2) type of case; (3) service; and (4) special damages.
 - Cases will be screened for transfer to First Municipal.
 - A Case Management Order (CMO) will be entered in every case at the initial Case Management Call (CMC), or once the parties are at issue. Parties must use the complaint filing date to calculate dates. Any substantial deviation from the prescribed dates in the draft order presented must be expressly requested and granted by the Court.

- d. Category 1 case types include non-complex cases such as auto accidents and premises liability actions and will have a 15-month order. Category 2 case types include complex cases such as professional malpractice and product liability actions and will have a 26-month order. Parties must the prescribed form order and indicate the filing date as well as the trial setting date, or trial date, on the top of each order. See Appendix A.

B. Interim, Continued, and Focused Case Management – Counsel with knowledge of the case shall appear and be prepared to report of the status of discovery and CMO compliance, and must bring printed copies of all prior orders. All CMOs have an interim case management date to determine whether discovery is timely proceeding and whether the case can be referred to the [Law Division Mandatory Arbitration Program](#).

C. Failure to Comply with CMO – As indicated in the prescribed form CMOs, "FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219(C) SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY."

IV. MOTIONS

A. Routine/Agreed Motions with Proposed Orders – Routine or agreed motions and proposed orders, *marked as such and with notice to all parties*, may be submitted to the Court by email by 4:00 p.m. on the business day prior to scheduled presentment.

- **What is routine?** Most frequently, and pursuant to [GAO 20-9](#): (1) agreed HIPAA orders (see [GAO 22-1](#), which includes a [sample](#)); (2) timely leave to vacate technical defaults; (3) leave to appear, answer, or plead; (4) leave to intervene on behalf of a worker's compensation carrier or public body claiming a lien; (5) voluntary dismissal of certain parties, or the entire case; and (6) dismissal orders for settlements, not involving those subject to the [Joint Memorandum on Settlement Procedures](#) (addressing Minors' and Disabled Persons' Personal Injury Cases and Wrongful Death Cases).
- **What is required in the email for a routine/agreed motion?** Specify the case name, case number, motion type, substance of the motion, and include the relevant attachments. The motion must be served on all parties prior to entry of the order. Provide draft orders in Word format and all other documents (e.g., motion, notices, exhibits) in PDF format.
- **What if I object to an opposing party's routine motion?** A party may promptly object to a routine motion via email with notice to all parties stating the basis of the objection. If there is an objection, the motion must be re-noticed for hearing as a contested motion.
- **Are agreed CMO modifications routine?** No. Failure to complete discovery by the deadline may result in waiver even if agreed. Dispositive motion deadlines and trial certification dates will not generally be extended.
- **Are there special considerations in dismissal orders?** Dismissal orders may only strike future court dates *in Courtroom 2206*. Also, an order dismissing a case pursuant to settlement should include a statement specifying whether voluntary mediation was or was not utilized.

- **How do parties receive orders?** *The clerk will not email copies of orders to parties given the volume of cases.* Orders must be retrieved from the [Clerk of the Circuit Court of Cook County \(CCC\) Portal](#).

B. Contested and Regular Motions – With proper notice, parties should schedule (“piggy-back”) motions for the next case management date. Parties may also schedule any contested and regular motions for presentment Monday, Tuesday or Thursday at 9:00 a.m.

- **Courtesy Copies.** Courtesy **hard copies** (i.e., paper, not emailed, copies) should be delivered to the Court for any motion scheduled for initial presentment at least **three (3) business days** in advance. Failure to timely submit a complete courtesy copy may result in striking or denial of the motion.
- **Preparation.** All parties should be prepared to address the motion at the time of presentment; a briefing schedule is not guaranteed.
- **Briefs.** Opening and Response Briefs shall be no more than fifteen (15) double-spaced pages and Replies shall be no more than ten (10) double-spaced pages, all utilizing 12-point font and 1-inch margins. Exhibits should be provided separately in a single packet with a table of contents and tabs. Documents relied upon in §2-1005 motions for summary judgment, §2-619 motions to dismiss, and §2-301(b) motions addressing jurisdiction must be attached to an affidavit in compliance with [Rule 191\(a\)](#). See Appendix B for sample briefing schedules.
- **Briefing on §2-615, §2-619, and §2-622 Motions, and Motions to Compel.** If the Court determines that briefing is necessary, it will not entertain reply briefs without specific leave of court. See Appendix B for sample briefing schedules if briefing is set by the Court.
- **Hearings.** Oral argument will not be granted on all contested motions. If granted, a hearing will be held or set as soon as practicable, and should not prevent continuing compliance with CMOs and meeting discovery deadlines. If the Court determines that it will issue a ruling without a hearing, the briefing order shall so reflect or the Court will notify the parties in advance of the hearing date.

C. Emergency Motions – Movants **must notify** the Court of any emergency motions with a proposed order **via hard copy and email** to Courtroom 2206 by **4:00 p.m.** the day before the motion is set to be heard. Movants must provide proper notice to all parties, and at the very least do so via email by **4:00 p.m.** the day before the motion is set to be heard. The email submitting the motion **must briefly set forth detailed grounds for hearing the motion on an emergency basis.** The Court may, in its discretion, determine that the matter is not an emergency and direct the movant to re-set the motion. Contested motions, emergency or not, must follow the procedure set out in section B.

V. PETITIONS TO APPROVE SETTLEMENT

Petitions to approve settlement orders in cases involving minors, disabled persons, and survival and wrongful death claims shall be presented to the Court electronically by emailing the unfiled petition to the email listed above. *Do not file* the petitions until approved by the Court. Follow the requirements set out in [Local Rules 6.4 and 6.5](#) and in [Final Procedures Concerning Settlement, Minors' and Disabled Persons' Personal Injury Cases and Wrongful Death Cases with Sample Petitions and Orders \(March 2023\)](#).

VI. PRE-TRIAL CONFERENCES

Pre-trial conferences may be scheduled in open court or by email to the Calendar A email account. At least two days before the pre-trial conference, each party should deliver to the court an unfiled pre-trial memorandum by email containing: (1) a summary of the allegations, defenses, facts, claimed injuries and damages; and (2) the last demand, offer, and policy limits.

VII. MISCELLANEOUS

- A. **Orders** – Entered orders may be obtained on the [Clerk of the Circuit Court of Cook County \(CCC\) Portal](#). Blank orders are available in Courtroom 2206. *See also* Appendices. Other blank order forms may be found on the [Clerk of the Circuit Court of Cook County's Court Forms](#) page. A [sample HIPPA order](#) can be found in [GAO 22-1](#) on the Court's website.
- B. **Communication with the Court** – *Ex parte* communications with the Court are prohibited. Emails to the Court *must* copy all opposing counsels/self-represented litigants or they will be ignored. Permitted email communication with the Court is *strictly limited* to submitting proposed orders, routine/agreed motions, and any email expressly permitted in this standing order or by the Court. *Note: pursuant to [Rule 11\(b\)](#), attorneys and self-represented litigants must include an email address to which documents and notices will be served in conformity with [Rule 131\(d\)](#) unless allowed otherwise by order of court.*
- C. **Self-Represented Litigants** – The Court, Law Clerks, Court Clerks, and other Court Personnel cannot provide legal advice to any party. Self-represented litigants must comply with the relevant provisions of the [Illinois Code of Civil Procedure](#), [Illinois Supreme Court Rules](#), and [Circuit Court of Cook County Rules](#). Other helpful, free resources are available through:
- Illinois Supreme Court Self-Help Resources – illinoiscourts.gov/self-help
 - Illinois Court Help – ilcourthelp.gov/hc/en-us
 - Illinois Supreme Court Commission on Access to Justice – atjil.org
 - Illinois Legal Aid Online – illinoislegalaid.org
 - Clerk of the Circuit Court of Cook County – cookcountyclerkofcourt.org
 - Cook County Sheriff's Office, Court Services – cookcountysheriffil.gov/departments/courts

Appendix A

(Case Management Order)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

Plaintiff(s),)	No: _____
)	
)	Calendar: _____
)	
-v-)	Filing Date: _____
)	
)	*2005 Trial Setting: _____
)	(12 mos or 24 mos from filing date)
)	
Defendant(s).)	*2005 Trial Date: _____

CASE MANAGEMENT ORDER
(Circle All Applicable Paragraph Numbers)

1. (4231) HIPAA Order, treater list, written fact, 213(f)(1), (f)(2), 214 discovery **issued** by: _____
2. (4296) Written fact, 213(f)(1), (f)(2), 214 discovery **completed** by _____
3. (4218) Party depositions, fact, 213(f)(1) depositions **completed** by: _____
4. (4288) 213(f)(2) subpoenas **issued** by (P) (D) (Other) by _____
5. (4218) 213(f)(2) depositions **completed** by _____
6. (4231) Dispositive motions **filed** by (P) (D) (Other) by _____
7. (4296) 215 and 216 discovery **completed** by _____
8. (4231) Parties **issue** 213 f(3) interrogatories by: _____
9. (4206) Plaintiff(s)/Defendant(s)/Add'l Party(ies) **answer** 213(f)(3) _____
10. (4218) Plaintiff(s)/Defendant(s)/Add'l Party(ies) 213(f)(3) depositions **completed** by _____

All discovery shall be completed no later than 60 days before trial (Rule 218).

11. (4619) The case is continued for CMC on _____ at _____ in Room _____ for:
- ☐ Service ☐ Pleadings ☐ Discovery ☐ Settlement ☐ Atty Appearance ☐ Other

***** COPIES OF ALL CMC ORDERS ARE REQUIRED ON ALL CMC COURT DATES *****

Failure to comply with this order shall be a basis for sanctions under Rule 219(c).
Failure to enforce this order shall constitute a forfeiture of such discovery by that party.

Name _____
Address _____
City/State _____
Telephone _____
E-mail _____
Atty. For _____
Atty. No. _____

ENTERED:

JUDGE

Appendix B

(Other Standard Orders)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

v.

No. _____

ORDER

This cause coming before the Court on _____'s
 Motion/Petition for _____
 filed on ____/____/_____, IT IS HEREBY ORDERED:

1. The initial brief(s) shall be filed/have been timely filed on or before ____/____/_____; (4231)
2. The respondent(s) shall have ____ days thereafter until ____/____/____ to respond; (4231)
3. The movant(s) shall have ____ days thereafter until until ____/____/____ to reply; (4231)
4. The following business day, ____/____/____, the movant(s) shall deliver **courtesy hard copies** to the Court of the Motion/Petition and all briefs, one set of exhibits including transcripts (mini/four-to-a-page), relevant/unique cited cases, and other documents as appropriate; (4374)
5. The matter is taken under advisement and set for ruling/status on ____/____/____ at ____:____ a.m./p.m. in Courtroom 2206 unless written ruling issues in advance. (4360)

Attorney No.: _____

Name: _____

Atty. for: _____

Address: _____

City/State/Zip: _____

Telephone: _____

ENTERED:

Dated: _____, _____

Judge_____
Judge's No.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

v.

No. _____

ORDER

This cause coming before the Court on _____'s
(choose one) 735 ILCS 5/2-619.1 | 735 ILCS 5/2-615 | 735 ILCS 5/2-619 | 735 ILCS 5/2-622 Motion
filed on __/__/____, IT IS HEREBY ORDERED:

1. The initial brief(s) shall be filed in ____ days or have been timely filed on or before __/__/____; (4231)
2. The Respondent(s) shall have ____ days thereafter to respond, until __/__/____; (4231)
3. The following business day, __/__/____, the Movant(s) shall deliver **courtesy hard copies** to the Court of the Motion/Petition and all briefs, one set of exhibits including transcripts, relevant/unique cited cases (*general standard of review case law relating to motions to dismiss, etc. are not necessary*), and other documents as appropriate. (4374)
4. The matter is taken under advisement and set for ruling/status on __/__/____ at __:__ a.m./p.m. in Courtroom 2206 unless written ruling issues in advance. (4619)

Attorney No.: _____

Name: _____

Atty. for: _____

Address: _____

City/State/Zip: _____

Telephone: _____

ENTERED:

Dated: _____, _____

Judge_____
Judge's No.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

v.

No. _____

ORDER

This cause coming to be heard upon the regular call of cases for case management, status, or on a motion, and it appearing to the Court that this cause has been settled by agreement of the parties:

IT IS HEREBY ORDERED that the above entitled cause be and the same is hereby dismissed with prejudice and without costs. (4011)

IT IS FURTHER ORDERED that all future dates in Courtroom 2206 are stricken, and the Court retains jurisdiction to effectuate the settlement, including enforcement, adjudication of liens, approval where necessary and any other pendant matters. (4331) (4361)

☐ This settlement was reached as a result of voluntary mediation. (4486)

☐ Voluntary mediation was not utilized in reaching this settlement. (4487)

Attorney No.: _____

Name: _____

Atty. for: _____

Address: _____

City/State/Zip: _____

Telephone: _____

ENTERED:

Dated: _____, _____

Judge

Judge's No.

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

Plaintiff(s)		NO:
-v-		
Defendant(s)		

**ORDER ON SETTLEMENT, DISMISSAL AND FUTURE PROCEEDINGS
FOR WRONGFUL DEATH, SURVIVAL, MINORS' AND
DISABLED PERSONS' LAWSUITS**

This cause coming before the Court for approval of settlement, dismissal, continuing the matter for future presentation of petitions for approval of settlement, approval of attorneys' fees and costs, determination of degree of dependency, allocation of proceeds of settlement, adjudication of liens, determination of net proceeds of settlement, determination of distribution of settlement proceeds, and enforcement thereof,

IT IS HEREBY ORDERED AS FOLLOWS:

- ☐ (4011) 1. The above-captioned matter be and is hereby dismissed pursuant to settlement, and the Court retains jurisdiction for all matters contained in Paragraph 2 and adjudication and/or enforcement thereof;
- ☐ (4619) 2. The matter is continued for presentation of petitions for approval of settlement, approval of attorneys' fees and costs, determination of degree of dependency, allocation of proceeds of settlement, adjudication of liens, determination of net proceeds of settlement, and determination of distribution of settlement proceeds, to _____, at _____ a.m./p.m., in Room 2206, Richard J. Daley Center, without further notice.;
- ☐ (4486) 3. The settlement was reached as a result voluntary mediation; OR
- ☐ (4487) 4. Voluntary mediation was not utilized to reach this settlement.

ENTER:

JUDGE

NO.