

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

**STANDING ORDER IN ALL CIVIL CASES INSTRUCTIONS
TO PARTIES AND COUNSEL**

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 case. 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

The Court's staff attorney is Trinity Townsend. He can be reached by telephone (404-613-4512) or e-mail (trinity.townsend@fultoncountyga.gov). Neither the parties nor their counsel should discuss the merits of the case with Mr. Townsend. Mailed, couriered, and hand delivered communications should be addressed as follows:

Mr. Trinity Townsend
Staff Attorney, Senior
Justice Center Tower
185 Central Ave. S.W.
Suite T-3755
Atlanta, GA 30303

2. Courtesy Copies

Parties are not required to forward courtesy copies of motions and other filings directly to chambers.

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 but firm deadlines.

Motions for extensions, whether opposed, unopposed or by consent, will be granted only upon a showing of good cause. Extensions of time to file Answers and/or responsive pleadings shall not be stipulated to or agreed upon by the parties without prior permission from the Court. Failure to secure the Court's prior permission will result in the Court adhering to the standard deadlines and any extensions stipulated to by the parties shall not be honored.

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 that 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 his responsive pleading, an averment in his 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, 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 his 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 may be disregarded by the Court.

A party who objects to a discovery request but then responds to the request must indicate whether the response is complete. For example, in response to an interrogatory, a party is not permitted to raise objections and then state, “Subject to these objections and without waiving them, the response is as follows” unless the party expressly indicates whether additional information would have been included in the response but for the objection(s).

Finally, evidence introduced at trial which was requested but not disclosed during the discovery period will not be admitted.

5. Serving Discovery Prior to Expiration of the Discovery Period

All discovery requests must be served early enough so that the responses thereto are due on or before the last day of the discovery period.

6. Extensions of the Discovery Period

Motions requesting an extension of the discovery period must be made prior to the expiration of the existing discovery period, and such motions ordinarily will be granted only in cases where good cause is shown.

7. Motions to Compel Discovery and Objections to Discovery

Prior to filing a motion to compel discovery, the movant - after conferring with the respondent in a good faith effort to resolve the dispute by agreement - should contact Mr. Townsend and notify him that the movant seeks relief with respect to a discovery matter. Ordinarily, Mr. Townsend will then schedule a conference call or meeting in which the Court will attempt to resolve the matter without the necessity of a formal motion. This process shall not apply to post-judgment discovery.

8. Motions for Summary Judgment and Daubert Motions

All Motions for Summary Judgment and Daubert Motions should be filed within 30 days after the close of discovery.

SO ORDERED, this 4th day of September, 2024.



Judge Eric A. Richardson
State Court of Fulton County