



First Judicial District of Pennsylvania
Court of Common Pleas of Philadelphia County
Trial Division – Civil Section

CIVIL CASE MANAGEMENT CONFERENCE

ADVICE TO COUNSEL

1. Be sure to fully complete the Case Management Conference Memorandum prior to the Case Management Conference. Five (5) days prior to the Case Management Order issuance date, *all parties* are required to electronically file with the Court and serve upon all opposing counsel and/or opposing parties not electronically served by the court a fully completed Case Management Memorandum. *Failure to timely file a Case Management Memorandum may result in monetary sanctions.* To electronically file the Case Management Memorandum, access the “Existing Case” section of the court’s electronic filing system. Select “Conference Submissions” as the filing category. Select “Management Memorandum” as the filing type. Any party not registered with the electronic filing system (“EFS”) may submit the Memorandum via e-mail or USPS first class mail:

CivilCaseManagement@courts.phila.gov.

Civil Case Management Conference Center
613 City Hall
Philadelphia, PA 19107

2. **Consult clients well in advance of the conference** to obtain pertinent information to prepare the memorandum. When supplying information on injuries or damages, it is insufficient for plaintiff to state “unknown,” “to be supplied,” or “under investigation.” In stating factual positions as to liability, it is insufficient to use non-descriptive terms, such as “liability certain,” “100% liability,” or “clear liability.” Litigants are asked to provide their date of birth, which is intended for Court use only and will not be made available to the public.
3. Counsel and/or self-represented parties shall access the Case Management Conference through the Zoom link posted on the website and listed below. To access the site from the court’s homepage select “Calendars” then “Common Pleas - Civil Remote Hearing Information.”

<https://www.courts.phila.gov/remote-hearings/>

Scroll down within the section “**Remote Hearing Information by Court Event Type**” under “General Program Hearings” to “Case Management Conference - Civil Case Management Center” and click on “Join Case Management Conference”. The Zoom link may be updated periodically, so use the Zoom link that is present on the date of the Conference.

4. Be fully prepared to discuss issues relating to service of process, venue, pleadings, discovery, joinder of additional parties, theories of liability, damages, applicable defenses, and status of settlement negotiations. Parties are encouraged to discuss these issues amongst themselves prior to the conference when possible. **Participation from fully prepared and cooperative parties leads to a more productive and meaningful conference.** Failure to file a Complaint or effectuate service of process prior to the conference date may result in issuance of a Rule to Show Cause.
5. Conduct discovery as soon as practicable, even while awaiting disposition of preliminary objections. **The presumptive discovery deadlines are calculated from the filing date of an action, not from the date of the Case Management Conference.** The pendency of Preliminary Objections does not stay discovery. If a formal stay is necessary, the parties should petition the Court accordingly.
6. Consider voluntarily transferring your case to the Compulsory Arbitration Program where appropriate. **The Case Managers can generate a *Praecipe* to Transfer and schedule a hearing date for you.** All cases having an amount in controversy, exclusive of interest and costs, of \$50,000 and less (except cases involving title to real estate) shall be assigned to the Compulsory Arbitration Program. (See *Philadelphia County Rules*, Rule *1301) The Team Leader Judges may *sua sponte* remand matters to the Compulsory Arbitration Program accordingly.
7. Be mindful that the **Case Management Conference is a Court proceeding.** The Case Managers are empowered by the Team Leader Judge to issue appropriate Orders to enforce compliance with program procedures and applicable Rules of Civil Procedure. Any Rule to Show Cause entered will be returnable before the Team Leader Judge. (See *Philadelphia County Rules*, General Court Regulation No. 95-2)
8. After the Case Management Conference is completed, upon receipt of the Case Management Order, carefully review the entire Case Management Order. **Be sure to promptly note all deadlines on your calendaring or tickler system.** You will receive notice from the Court of actual Settlement Conference and Pre-trial Conference dates and related instructions in due course.
9. Motions for Extraordinary Relief seeking extension of deadlines must be filed **before** the expiration of the deadlines at issue.
10. If the case settles prior to the Conference, a Settlement Letter must be filed through the Electronic Filing System (EFS). In the EFS, access the “Existing Case” section, select

“Conference Submissions” as the filing category, then select “Settlement Letter” as the filing type.

11. Any request for continuance **must** be made in writing. Counsel must e-file letter requests electronically through the EFS. Access the “Existing Case” section, then choose “Case Management Conference Continuance Request” as the filing type. Self-represented litigants may send requests via first class mail, e-mail or the EFS, but **must** send a carbon copy to all opposing parties or their attorney of record:

Civil Case Management Conference Center
ATTN: Request for Continuance
613 City Hall
Philadelphia PA, 19107
CivilCaseManagement@courts.phila.gov

Requests should be made at least 72 hours prior to the scheduled Case Management Conference.

12. Please direct any questions regarding Civil Case Management by e-mail to CivilCaseManagement@courts.phila.gov.

¹ Disclosure of date of birth is voluntary. Effective September 5, 2017, in a continuing effort to implement the recommendations of the *Elder Law Task Force* appointed by the Supreme Court of Pennsylvania, litigants and other persons involved in civil proceedings on the Court of Common Pleas are being asked to provide date of birth information.

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION

	:		
:	:		
Plaintiff	:	_____TERM	20 ____
	:		
v.	:	No.: _____	
	:		
:	:		
Defendant	:	CASE MANAGEMENT	
	:	CONFERENCE MEMORANDUM	
	:		

DISCLAIMER:

**THIS DOCUMENT IS SOLELY USED FOR CASE MANAGEMENT PURPOSES
AND SHALL NOT BE USED FOR ANY OTHER PURPOSE.**

Date and Time of the Case Management Conference:

Filing Party:

Attorney of Record:

BAR ID:

Address of Attorney:

Email and Telephone for Filing Attorney:

Personal Injury	Complete Section I
Real Estate case type	Complete Section II
All other case types	Complete Section III

SECTION I – PERSONAL INJURY

FOR ALL PARTIES:

1. Alleged date and location of alleged accident or occurrence:
2. Are there any related cases or claims pending, if known? Yes: No:
If so, list caption(s) and docket number(s) or other appropriate identifier(s):
3. Do you anticipate joining additional parties at this time? Yes: No:

Comment:

4. Current Demand: Current Offer:

Note: The demand cannot be “unknown” or “to be determined;” it must be expressed in a monetary value.

5. On behalf of the responding party, are you interested in court - supervised early mediation? YES NO

FOR THE PLAINTIFF:

Note: Responses such as “to be determined” or “unknown” are disfavored and strongly discouraged.

6. Age of Plaintiff on date of alleged accident or occurrence:
7. Set forth a summary of facts giving rise to cause(s) of action:

8. Identify most serious injuries sustained:

9. Is there any permanent injury claimed? YES: NO:

If yes, indicate the type of permanent injury:

10. Please identify each medical treatment facility or medical provider by name, address, and dates of medical treatment:

11. Is medical treatment continuing? YES: NO:

If “yes”, please identify at which facility or provider:

12. Has there been an inpatient hospitalization? YES: NO:

13. Has there been any surgery, injection or diagnostic testing performed? YES: NO:
If yes, indicate the type of surgery, injection or diagnostic test performed:
14. Approximate medical bills to date:
15. Approximate medical bills recoverable in this case:
16. In Automobile cases, has PIP been exhausted? If available, please provide a PIP Log to all counsel prior to the Conference.
17. In Automobile cases, please identify Plaintiff's tort status. Please also provide the executed tort waiver in effect as of date of loss and the Declaration Page to all counsel prior to the Conference. If there is an issue with Plaintiff's tort status, please explain.
18. Are there any existing liens (Workers' Compensation, DPW, Medical, etc.?) YES: NO:
If yes, what type and approximate amount?
19. Was Plaintiff employed at the time of the accident or occurrence? YES: NO:
If yes, identify Plaintiff's occupation:
20. Is there a claim for past lost wages? YES: NO:
If yes, approximate past lost wages:
21. Is there a claim for future lost earning capacity? YES: NO:
If yes, approximate future lost earning capacity:
22. Other than the parties, identify by name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment. Counsel should demonstrate reasonable effort in identifying witnesses.
- Individual 1 - Name, address and telephone number or person and subject of discoverable information:
- Individual 2 - Name, address and telephone number of person and subject of discoverable information:

FOR THE DEFENDANT:

23. If an answer has been filed, set forth a summary of the applicable defense(s) or any counterclaim, if known:

24. At this time, does the Defense contest:

- a. liability YES: NO: UNKNOWN:
- b. causation YES: NO: UNKNOWN:
- c. economic damages YES: NO: UNKNOWN:
- d. non-economic damages YES: NO: UNKNOWN:

26. Identify all known insurance coverage, including excess coverage, under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

<i>Defendant</i>	<i>Insurance Carrier</i>	<i>Coverage Limits</i>
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Defendant 1:

Defendant 2:

Please provide the Declaration(s) Page, if available, to all counsel prior to the Conference.

27. At this time, are you aware of issues as to the applicability of the above insurance coverage?

YES NO N/A

If you stated “YES” or “N/A”, please explain:

28. Other than the parties, identify by name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment. Counsel should demonstrate reasonable effort in identifying witnesses.

Individual 1 - Name, address and telephone number of person and subject of discoverable information:

Individual 2 - Name, address and telephone number of person and subject of discoverable information:

SECTION II – REAL ESTATE CASES

This section is to be completed in all cases that involve real estate

1. What claims are asserted in this case? Please check all that apply.
 - a. Quiet Title
 - b. Ejectment
 - c. Mortgage foreclosure
 - d. Other (please specify)
2. State the address of property at issue:
3. Please attach the following documents
 - a. Last recorded deed or any other deed at issue
 - b. Any lease related to any claim, defense or counterclaim
 - c. Any other documents through which you claim an interest in the real estate at issue
4. Service
 - a. Have the defendants been served with original process? YES NO
 - b. Identify who was served
 - c. Describe how they were served
 - d. When?
 - e. By whom?
 - f. Were any parties not yet served? YES: NO:
If yes, identify who has not yet been served:
5. Are you now in possession? YES: NO:
6. Are any related cases or claims pending? YES: NO:

If yes, identify all such cases or claims by caption, case number and court where they are pending

7. If you are the plaintiff, are you related to the defendant; if you are the defendant, are you related to the plaintiff? YES: NO:

If yes, identify if you are the opposing party's spouse, former spouse, child or sibling:

8. Are any of the owners on the last deed or deed at issue deceased?

YES: NO: UNKNOWN:

- a. If yes, has an estate been raised? YES: NO:

9. Do you require discovery? YES: NO:

- a. How much time do you need and why?

10. If you have filed a claim, what relief are you requesting? Please check all that apply:

- a. Possession
- b. An order to quiet title
- c. Money damages
- d. Judgment in mortgage foreclosure
- e. Other Please specify

11. If you are the plaintiff, set forth the facts of your claim:

12. Are there any counterclaims? YES: NO:

13. If yes, set forth the facts of any counterclaim:

SECTION III – ALL OTHER CASE TYPES

This section is to be completed in all cases other than personal injury or real estate-related

1. Date of contract or transaction:

2. Date of Birth of your client:

Age on date of transaction:

Unknown

Decline to provide

NOTE: Date of birth information is intended for the Court's use only. The information will not be made available to the public.

3. Is there a writing? YES: NO:

If yes, is there an allegation that the writing does not contain the entire agreement of the parties?

YES: NO:

4. Is the Uniform Commercial Code applicable to this case? YES: NO:

5. Set forth a summary of facts giving rise to the cause of action:

6. Are there any related cases or claims pending? YES: NO:

If so, list caption(s), docket number(s) or other appropriate identifiers:

7. State the amount of damages claimed by Plaintiff:

- (a) Direct
- (b) Consequential
- (c) Other (specify)

8. Set Forth a summary of facts in support of applicable defense(s) or any counterclaim:

If there is a counterclaim, state the amount of damages sought:

(a) Direct:

(b) Consequential:

(c) Other (specify)

9. Identify all applicable insurance coverage:

<i>Defendant</i>	<i>Insurance Carrier</i>	<i>Coverage Limits</i>
_____	_____	_____
_____	_____	_____

10. Demand: \$
\$

Offer: