COBB COUNTY, GA
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TAHNICIA PHILLIPS
STATE COURT CLERK-[illegible]

IN THE STATE COURT OF COBB COUNTY
STATE OF GEORGIA

JUDGE ERIC A. BREWTON'S STANDING
SCHEDULING ORDER FOR PRETRIAL PROCEDURES IN CIVIL CASES[1]

The following procedures are to be followed in the preparation and filing of proposed Consolidated Pretrial Orders and supersede any provisions to the contrary proposed by the parties[2]:

1. Counsel shall consolidate the proposed pretrial order. **The Court will not enter pretrial orders which contain provisions attempting to reserve the right to amend the pretrial order or reserve the right to conduct discovery**. Amendments will be allowed only upon order of the Court and upon good cause shown. Failure of a party to submit its portion of the proposed pretrial order may result in sanctions. Uniform Rule 7.1.

2. If special damages are being alleged, they **must be stated with specificity**, including the identity and amount of each item of special damages in paragraph 11.

3. The following **shall be added to the Consolidated Pretrial Order at paragraph 3:**

   a. Motions in Limine: Except for unforeseen evidentiary issues, **all motions in limine and responses thereto are to be filed prior to, or as a part of, the proposed pretrial order.** The following motions in limine are hereby made by the parties including any supportive legal citations. The Court shall rule on said motions without oral argument unless a hearing is ordered by the Court upon request of either party.

   Plaintiff's Motions in Limine:

   Defendant's Motions in Limine:

   Parties acknowledge that counsel is directed to notify the Court on the record at the time of any contention that the Court's ruling on a motion in limine has been violated during trial.

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[1] The Court has used the Consolidated Pre-Trial Order form that is found in on the Cobb County State Clerk's Website in the Civil Division, Civil Forms Section located here: https://www.cobbcounty.gov/courts/state-court/clerk/civil-division

[2] As stated in the Clerk's Notice of Pre-Trial Procedure, a copy of all Proposed Consolidated Pre-trial Orders shall be emailed to Judge Brewton's Staff Attorney, Mary Catherine Greaber, at marycatherine.greaber@cobbcounty.gov.

b. Dispositive Motions: All dispositive motions shall be filed prior to, or concurrently with, the proposed pretrial order. Absent an order from the Court, all responses shall be filed within 30 days of the filing of the dispositive motion.

c. Daubert Motions: All Daubert motions shall be filed prior to, or concurrently with, the proposed pretrial order. Absent an order from the Court, all responses shall be filed within 30 days of the filing of the Daubert motion.

4. The following **shall be added to the Consolidated Pretrial Order** as part of **paragraph 5(a)**:

Trial Depositions: All discovery has been completed, unless otherwise noted, and the Court will not consider any further motions to compel discovery except for good cause shown. The parties, however, shall be permitted to take depositions of any person(s) for the preservation of evidence at trial **no later than 60 days following the entry of the Consolidated Pretrial Order**

~~5.~~ The following **shall be added to the Consolidated Pretrial Order at paragraph 13**:

I. All physical and documentary evidence that a party intends to introduce at trial must be specifically identified in the Consolidated Pretrial Order.

II. Medical Records introduced under O.C.G.A. § 24-8-803(6): All medical records that a party intends to introduce under O.C.G.A. § 24-8-803(6) must be **specifically identified** as such in the Consolidated Pretrial Order. Upon notification that a party intends to introduce medical records under O.C.G.A. § 24-8-803(6), an opposing party **shall have 30 days** to file a request for the production of such documents. Upon the receipt of such a request for production, the party seeking to introduce medical records under O.C.G.A. § 24-8-803(6) **shall produce such medical records within 15 Days** of the receipt of a request for production.

III. Supplementation of Discovery: The parties are directed to supplement discovery responses pursuant to O.C.G.A. § 9-11-26(e) **within thirty (30) days of the entry of the Consolidated Pretrial Order.** Failure to supplement may result in sanctions including exclusion of testimony or witnesses. O.C.G.A. § 9-11-26(e)(3).

IV. Supplementation of Document Lists: Any party may supplement its list of physical or documentary evidence **no later than 45 days prior to trial with adequate notice to opposing counsel and leave of Court.**

6. The following **shall be added to the Consolidated Pretrial Order at paragraph 18:**

   e) Identification of non-authentication witnesses: The parties **must specifically identify the name of any non-authentication witness within thirty (30) days of the entry of the Consolidated Pretrial Order** and may not rely upon any nonspecific designation. Failure to do so may result in exclusion of the witness.

   f) Supplementation of Witness Lists: Any party may supplement its list of potential witnesses **no later than 45 days prior to trial with adequate notice to opposing counsel and leave of Court** if the additional witness was disclosed during discovery. Any such additional witnesses must be made available for a deposition **within thirty (30) days following the amendment to the Consolidated Pretrial Order.**

7. The following language **shall be substituted in the Consolidated Pretrial Order at paragraph 16:**

   I. Absent an Order from the Court, all requested jury charges and proposed verdict forms **shall be filed and submitted via email** to marycatherine.greaber@cobbcounty.gov no later than 12 p.m. the Monday prior to the first day of the trial calendar.

8. The following **shall be added to the Consolidated Pretrial Order as paragraph 21:**

   a) Deposition Objections: Prior to trial, counsel shall make a good faith effort to resolve any objections in depositions to be presented at trial. **All unresolved objections, together with argument and citations, shall be filed, with a copy to the Court, no later than fifteen (15) days prior to trial.** Any objections not brought before the Court fifteen days prior to trial shall be deemed waived.

   b) Medical Narratives: Notice of intent to use medical narratives **must be filed with the Court no later than the filing of the Consolidated Pretrial Order** and all proposed narratives **must be filed with the Court no later than 60 days prior to trial.** Counsel shall make a good faith effort to resolve any objections to proposed medical narrative reports. The Court shall rule on any objections timely filed, pursuant to under O.C.G.A. § 24-8-826, without oral argument unless a hearing is ordered by the Court upon request of either party at the time of filing.

SO ORDERED, this 12th day of November 2025.

Eric A. Brewton, Judge
State Court of Cobb County