

## **CLE MOTION PRACTICE**

**JANUARY 18, 2009**

**David Ray & Josh Steinberg**

**12:00pm - 1:00pm**

Presentation of current filing practices of Motions in Philadelphia and the surrounding Courts of Common Pleas.

### **I. BUCKS COUNTY:**

#### **A. REQUIREMENTS SPECIFIC TO THE COUNTY**

1. Judges' identifications
2. Oral Arguments
3. \*Rule 208.3(b)
4. Differences between Petitions and Motions
5. Rule \*261 Requirements
6. Rules to Show Cause
7. Deposition Rule

### **II. MONTGOMERY COUNTY:**

#### **A. MOTION FILING AND PROCEDURE**

#### **B. TRIAL CERTIFICATIONS AND REQUIREMENTS**

### **III. DELAWARE COUNTY:**

#### **A. MOTION REQUIREMENTS**

1. Discovery
2. Sanctions
3. Deposition Rule

### **IV. PHILADELPHIA COUNTY:**

- A. Scheduling Changes Pursuant to Court Notice
- B. Motion Requirements
  1. All Motions
  2. Motions to Compel Answers to Discovery/RPD
  3. Motions to Compel Depositions
  4. Motions to Compel IME
  5. Miscellaneous Motions
  6. Motions for Extraordinary Relief
- C. Practical Tips