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## PADC AND PTLA JOINT MEMORANDUM # 1

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**TO:** PADC & PTLA MEMBERS  
**FROM:** ROBERT COSGROVE, PADC & TIMOTHY LAWN, PTLA  
**CC:** HONORABLE SHEILA WOODS-SKIPPER, HONORABLE JACQUELINE F. ALLEN,  
HONORABLE IDEE C. FOX, PETER DIVON  
**SUBJECT:** ADMINISTRATIVE PRACTICE RULE # 1  
**DATE:** JULY 5, 2018

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As some of our members may be aware, the PADC and PTLA have begun a series of joint meetings with the Philadelphia judiciary. The purpose of these meetings is to provide input to and solicit feedback from the judiciary on various topics of interest both to the bench and the bar. Further to those discussions, when a consensus on a particular topic between the judiciary, PADC and PTLA has been reached, with the approval of Judge Woods-Skipper, Judge Allen and Judge Fox, we intend on disseminating to our respective memberships just what the consensus or protocol is. This memorandum represents our first effort to do just that.

First, we are pleased to announce that, through the intercession of Judge Woods-Skipper, attorney access cards to City Hall will be placed on a six month access cycle (as opposed to the current 60 day cycle). You must use the card once every 6 months for the card to remain active. The new protocol should be active by September 1, 2018

Second, an issue that often arises for plaintiffs and defendants alike, is when a later-in-time case is filed and then consolidated with an earlier case. Because of various practical judicial concerns, the case management deadlines for the earlier case control both cases, which can seem unfair to the newly joined parties. Judge Fox has advised us that the way to address this issue is to file a motion for extraordinary relief that is as specific as possible and then, in special or particularly complex cases, also write the team leader to request a case management conference.

Third, in some cases, the resolution of a/ various motion/motions in limine may be essential to the trial strategy or the case's resolution. In such cases, the litigants should alert the court of this reality at the pre-trial conference so the team leader can try to assign the case to a judge 7 to 10 days before jury selection. Such special relief should only be requested in special or particularly complex cases.

Fourth, if a case settles, the litigants must advise the court immediately of the settlement as soon as possible, but no later than, 24 hours (if possible) before the settlement conference or jury selection.

For questions or more information, please contact Bob Cosgrove (PADC) at [rcosgrove@wcmlaw.com](mailto:rcosgrove@wcmlaw.com) or Tim Lawn (PTLA) at [trlawn@rayneslaw.com](mailto:trlawn@rayneslaw.com).