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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

[_____])
Plaintiff(s),)
vs.)
[_____ and [DOES 1-___],)
Inclusive,)
Defendant(s).)

Case No: _____

**PETITION REQUESTING
ADMISSION INTO PILOT
PROGRAM**

Plaintiff(s) _____ and Defendant(s) _____, by
and through their respective counsel, submit the following written petition requesting admission into
Department 41's Unlimited Case Pilot Program.

1. This case qualifies for admission into the Pilot Program because it is anticipated that there
will be significant discovery disputes and/or an unusual number of percipient/expert witnesses and/or
multiple parties and/or substantial electronic discovery.

2. The parties and their respective counsel have read and agree to comply with Department 41's
Pilot Program Rules and Procedures, including, but not limited to:

///

1 a) all meet and confer orders by the Court will require that counsel will not engage in
2 perfunctory meetings and discussions but, rather, will each engage in sincere, meaningful
3 and good faith meetings, in person if possible, to arrive at consensus, where possible, and
4 not to be involved in such tactical strategies as “scorched earth”, “hide the ball” and
5 “catch me if you can”.

6 b) Counsel acknowledge that they have a dual role as both advocates and officers of the
7 court; therefore, all counsel involved in this case, from senior lead trial counsel to the
8 most junior associate, represent that they have carefully read and agree to abide by the
9 Ventura County Bar Associations Code of Civility, a copy of which is posted on the
10 Court’s website.

11
12 3. To assist the Court in achieving its goal of reducing the costs of litigation, lead counsel in this
13 case, except for counsel who neither reside nor have an office in Ventura County (see Paragraph 4
14 below), agree to serve as a discovery referee and/or settlement pro tem Judge for up to six (6) hours per
15 year at the compensation rate of \$50.00 per hour, per unrelated party. Note: For purposes of establishing
16 these \$50.00 per hour compensation rates for work in other cases, all family members or party doing
17 business under a fictitious name shall be deemed to be one unrelated party. All other parties to this
18 action will be deemed unrelated parties and be required to each pay \$50.00 per hour to the attorney
19 acting as a discovery referee or an ADR pro tem. If called on to serve in such capacity, counsel agree to
20 abide by the ADR ethical requirements of being honest and diligent, of acting in good faith, and of not
21 advancing their own personal interests. In addition, counsel working in other cases agree to treat all
22 written and oral communications made during these proceedings, except those that are agreed by the
23 parties to be disclosed, confidential (See California Rules of Court 3.850). Finally, to ensure
24 competency, counsel must represent that they have been in practice as attorneys in excess of thirteen
25 (13) years OR have completed a Temporary Judge Training Program within the last 3-years and
26 received the Court ADR training.

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1 4. Counsel who neither reside, nor have an office in Ventura County, agree to petition Judge
2 Bysshe for a waiver of the requirement to work in a quasi judicial capacity at the reduced compensation
3 in other cases by participating in other programs deemed appropriate by Judge Bysshe to assist the Court
4 in reducing the costs of litigation.

5
6 5. The parties agree that this case will be managed by Judge Bysshe with the goal of completing
7 the case within one year, but he may, for good cause, extend the completion date beyond one year.

8
9 Dated: _____ Counsel for Plaintiff(s)

10 Dated: _____

11 Dated: _____

12
13 Dated: _____ Counsel for Defendant(s)

14 Dated: _____

15 Dated: _____