

DIVISION 16 STANDING ORDER  
DISCOVERY DISPUTES IN ALL CIVIL CASES

In addition to the requirements of the Missouri Supreme Court Rules and the Local Rules of the 21st Judicial Circuit, no discovery disputes (including motions to compel discovery responses or motions for sanctions) will be heard in Division 16 unless, prior to obtaining a hearing date from the division clerk, counsel for the parties meet at least once in person or by video conference in a good faith effort to resolve their discovery disputes and file a joint memorandum with the Court, substantially in the form attached hereto, setting forth:

1. the date of the meeting, and whether the meeting was in person or by video conference;
2. the names and bar numbers of the attorneys attending the meeting;
3. the length of the meeting;
4. a brief description of the discovery disputes not resolved at the meeting, with a copy of the discovery request(s) and the objection(s) thereto attached; and
5. a certification by counsel that their respective clients have been informed of the meeting and the inability of counsel to resolve their discovery disputes without a court appearance.

Good Cause Exception and Sanctions

A party may request excusal from the in-person meeting requirement of this order for good cause shown, such as opposing counsel's refusal to respond to requests to meet and confer. In the event of such refusal, the moving party shall advise the Court in its motion as to what sanctions it seeks against the non-complying party.

SO ORDERED:

Jeffery T. McPherson  
Circuit Judge, Division 16

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI

\_\_\_\_\_, )  
Plaintiff, )  
 ) No. \_\_\_\_\_  
v. )  
 ) Division 16  
\_\_\_\_\_, )  
Defendant. )

JOINT MEMORANDUM  
REGARDING GOOD FAITH EFFORT TO RESOLVE DISCOVERY DISPUTE

The parties, by and through undersigned counsel, state to the Court as follows:

1. Counsel for the parties met on \_\_\_\_\_ (date), at the following location: \_\_\_\_\_.
2. Present at the meeting were the following attorneys: \_\_\_\_\_.
3. The meeting lasted \_\_\_\_\_ hours/minutes.
4. Counsel were able to resolve all current discovery disputes other than the following:  
\_\_\_\_\_.
5. The undersigned counsel further certify that their respective clients have been informed of the meeting and the inability of counsel to resolve their discovery dispute without a Court appearance.

\_\_\_\_\_  
Plaintiff's Counsel

\_\_\_\_\_  
Defendant's Counsel