

Judicial Operating Procedures

for

THE HONORABLE WRENN L. WATSON

I. COMMUNICATING WITH THE COURT

- A. **Inquiries** – Inquiries concerning Court procedures and the appropriate method for contacting or communicating with the Court should be directed to the Administrative Assistant, Tip Staff, or Law Clerk, in that order of preference. E-mail is the preferred means of communication.

Judge Watson Chambers: judgetwatsonchambers@alleghenycourts.us

Judge Watson Delinquency: judgetwatsondelinquency@alleghenycourts.us

Judge Watson Motion: judgetwatsonmotions@alleghenycourts.us

Judge Watson OCYF: judgetwatsonocyf@alleghenycourts.us

Ex Parte Communication – Counsel and/or the parties shall not engage in *ex parte* communication concerning a past or pending case with the Court or judicial staff. Such communication may provide a basis to refer the matter to the Pennsylvania Disciplinary Board or may result in the imposition of other appropriate sanctions.

- B. **Hours of Operation** – Chambers is staffed from 9:00 AM to 4:30 PM. On most days, staff anticipates going to lunch from Noon to 1:00 PM.
- C. **Substantive Legal Matters** – Judicial staff is prohibited from discussing substantive legal matters about past or present cases. An inquiry about the status of a case does not violate of this prohibition.,

II. SCHEDULING

- A. **Be Ready.** When the case is called, counsel should be ready to proceed.
- B. **Settling Before Trial** – If you settle your case before trial, counsel shall inform the Court as soon as possible. If counsel believe a conference at any time before the proceeding may help resolve the case, counsel should inform the tipstaff as early as possible.

- C. **Respecting the Time Set Aside for Your Case** – You should plan to use the time set aside for the case wisely and efficiently. Bear in mind that if you run out of time, additional trial time may not be available for several weeks.
- D. **Postponing/Continuance** – Continuances will not normally be granted if your case is inside 30 days of a scheduled hearing date. If you want an exception to apply, you may do so by motion.

III. ADVANCE COMMUNICATION TECHNOLOGY

- A. **Overview.** For certain proceedings and situations, the Court will use advanced communication technology, specifically the TEAMS application from Microsoft. In order to do so:
 - 1. It is critical for the Court to have email addresses and cell phone numbers of parties and lawyers. We need this information in the event of a technology failure as you may need to be contacted. Email addresses and cell phone numbers should be provided on cover sheets for motions and other pleadings.
 - 2. Counsel and their clients are to be familiar with Microsoft TEAMS technology. Please practice using the TEAMS application prior to any remote scheduled matters.
 - 3. Additional TEAMS Tips are set further in Section X.
- B. **TEAMS Links/Virtual Appearances** – In the event where one cannot attend in person, a request for a TEAMS link must be made 48 hours in advance. Requests shall be sent to jyoung@allegheycourts.us.
- C. **Teams Invitation.** Teams' invitation for proceedings will be forwarded to the Lawyers only. It shall be the responsibility of the lawyer to forward the invite/link to their client and/or witness.
- D. **Remote proceedings.**
 - 1. The Court adheres to the traditional view that all proceedings are to be in person.
 - 2. Parties may appear remotely only after permission has been granted by the Court.

3. All participants appearing via TEAMS must be in a quiet place with a stable internet connection and be excluded from other person(s) during their participation.
4. Counsel should be prepared to have any exhibits that they intend to enter as evidence during the proceeding scanned into a PDF format and properly labeled as an exhibit with a corresponding letter or number. Counsel and parties should also be prepared to email the exhibit as an attachment during the proceeding, if admissible, to yjyoung@alleghenycourts.us. Please use the name of the case docket number and the exhibit number/letter in the subject line when sending emails with exhibits. By example, the “RE:” of your email should look like this: Sally Smith. JV-0123-2024, Exhibit A.
5. It is the responsibility of all attorneys to maintain their evidence and provide a list.
6. If you have not received a TEAMS link by 2pm on the business day before you were expecting one, please e-mail all members of the judicial staff.
7. If parties want to request that a proceeding be held remotely, they must make that request by a motion consistent with this court's motion's practice. See Section II.

E. Telephone

1. A remote appearance shall be by video technology. Participation by telephone is discouraged because the court is deprived of the ability to see the person which can contribute to a credibility determination. That being said, the Court recognizes exceptional circumstances may occur.

IV. JUVENILE COURT MATTERS

A. Status Hearings in Juvenile Matters

1. In delinquency matters, unless otherwise noted, the Court only expects the child, the counsel, the probation officer and/or caseworker and, when possible, the parents to be present.

B. Physical Maltreatment Cases in Dependency Matters

1. Whenever a new dependency petition is filed that alleges physical maltreatment, and any party intends to call an expert witness to prove or

refute the allegation of abuse, the full hearing will be heard on one of Judge Watson's complex days.

2. As such, all parties should assume that the first listing of the matter on a regular dependency day (Wednesday) will be treated as a pre-hearing conference unless there is a stipulation or some other resolution that will make the case of a shorter length.
3. If any party has a question about whether a particular case falls under this SOP, please contact dchontos@allegheycourts.us for clarification.

C. Juvenile Motions (Delinquency & Dependency)

1. All Motions shall be filed electronically via PACFile prior to being addressed by the Court. Juvenile motions are to be properly filed on PACEFile and a courtesy copy either hand-delivered or sent to the Court's Legal Assistant at wtorbert@allegheycourts.us, the Court's Law Clerk at dchontos@allegheycourts.us and the Court's Tip staff at jyoung@allegheycourts.us.
2. Email **all** motions to the following email addresses: judgewatson.motions@allegheycourts.us.
3. Uncontested and/or Consent Motions shall be captioned as such, and Orders will be entered promptly upon receipt unless the Court believes a hearing is needed.
4. If discussion or argument on the motion is needed, **motions will be heard daily at 9am** in-person unless otherwise indicated by the Court. Movant is responsible for ensuring that all necessary parties are present to be heard on the motion.

For a Termination of Parental Rights Matters (TPR), please note the changes in who to email. The list is as follows:

wtorbert@allegheycourts.us,
dchontos@allegheycourts.us and
jyoung@allegheycourts.us

- D. A copy of the motion shall be emailed to the caseworker in dependency matters and the juvenile probation officer in delinquency matters. For dual supervision cases, both the caseworker and the probation officer shall be served as well as counsel for the parties in both the dependency and delinquency case. If a Court appointed advocate (CASA) has been appointed, a copy to the motion shall be sent to CASA via email.

- E. The party presenting the motion must indicate whether opposing counsel and/or the other parties have an objection to, no objection to, or consent to the motion.
- F. If a party consents to or does not object to the motion, the Court will enter an order through CPCMS/PACFile.
- G. Motions requiring argument or a hearing may be presented in court at 9:00 AM on any day that Judge Watson is hearing juvenile cases. If a full hearing is needed, the Court will schedule a hearing for a date and time certain.
- H. If the motion is an emergency, and Judge Watson is unavailable to hear the motion, then the motion shall be presented to the judge who is hearing Juvenile Motions.

V. MOTIONS

A. General

All motions in front of Judge Watson will be in person unless special arrangements are requested and granted to participate remotely.

1. Motions should be submitted via email to judgewatson.motions@alleghenycourts.us.
2. Do not deliver original motions or documents to chambers.
3. There will not be a sign-up sheet for motions at chambers. Motions are heard in the sequence deemed most expedient for the court. A preference may be given to cases where all parties/counsel are timely, a consent order is presented, or a motion is uncontested.
4. Alternatively, should the parties prefer that the court rule on the motion without oral argument, they must check the appropriate box on the attorney motion submission form stating that the parties/counsel agree to having the motion decided on the pleadings alone. If all parties waive oral argument, the court will remove the motion from the list and will decide the motion on the pleadings submitted.
5. Some motions may be disposed of before the Motions Court date. The Court will advise the parties if this is the case so that they do not have to appear to present their motion. If the Court does not direct you otherwise, you are required to appear for Motions Court.

6. Attorneys should submit their motions, with the required Motions Admission Form (available on the Fifth Judicial District Website), to judgewatson.motions@alleghenycourts.us. If your email was successfully received, then you will receive an email response of “Received” or an automatic response noting that your email has been received.
7. The Court will not act on any motion that has not been served or given proper notice to the opposing party.
8. The Court will not act on any motion where the parties and/or counsel did not follow Allegheny County Local Rule 1930 to meet and confer. Sending an e-mail with the motion is not sufficient to satisfy the rule.
9. The fact that the opposing party or the moving party is self-represented does not excuse the requirement to meet and confer.
10. Motions must include a Notice of Presentation and a Certificate of Service unless the motion is consented to by all parties. The Notice of Presentation shall be on the page immediately after the cover page. The Certificate of Service may appear on the same page as the Notice of Presentation. If not there, the Certificate of Service shall be on the page immediately before the proposed order.
11. If the Motion includes a request for counsel’s fees, an Affidavit of Counsel Fees detailing the amount requested must be included as an Exhibit in the Motion
12. The Motion shall include a proposed order. The proposed order should be submitted as a Word document. The signature area of the proposed order should look like this:

By the Court:

Judge Wrenna L. Watson
13. The opposing party/counsel should notify the Court at judgewatson.motions@alleghenycourts.us as to whether they consent to or oppose the Motion, even if they do not submit a formal response.

B. Regular Motions

1. The party submitting a motion must serve the motion on the opposing party at least five (5) calendar days before Judge Watson's scheduled Motions date. Any response to a motion is due no later than two (2) days before the motion is presented.

C. Emergency Motions

1. The Court has discretion to challenge the nature of any motion designated as an "emergency." Motions deemed to be true emergencies submitted weekdays before 12 Noon are eligible for same-day decision at the Court's discretion. Emergency Motions submitted after 12 Noon are not eligible for same-day decision but may be ruled upon by the end of business on the next day.
2. An Emergency Motion is a special motion used for considering a decision quickly to avoid irreparable harm. An Emergency Motion provides immediate relief as the court's response is delivered more quickly than a Regular Motion. Common emergency issues include, but are not limited to, the following:
 - i. A Child is suffering a serious or life-threatening injury or condition which requires immediate medical treatment;
 - ii. A threat that a party will leave the jurisdiction with a Child exists (such as taking the child across state lines or outside of the United States);
 - iii. A party is putting a Child in danger;
 - iv. A custodial parent is experiencing a drug, or mental health crisis;
 - v. A parent has been charged or convicted of a violent crime, such as homicide, aggravated assault, terroristic threats, stalking, false imprisonment, arson, child abuse, or similar such offenses.

3. The Court may email the parties a Microsoft TEAMS link for oral argument. The Court may request that the parties join the TEAMS proceeding.
4. Where possible, counsel is urged to serve the respondent via email.

D. Expedited Motions

1. Expedited Motions are motions that are not considered an “emergency,” but need to be decided quickly before a Hearing, Conciliation, or Trial is scheduled to occur.
2. Expedited Motions will ONLY be considered for procedural matters (i.e.: scheduling, witness testimony, etc.), NOT for substantive matters (issues that involve matters of major or practical importance to all concerns, such as the facts of the case, requesting special relief from the court, etc.).
3. If a motion is expedited, the moving party should state so in the email sent to Chambers three (3) calendar days prior to presentation of the Motion, as well as on the cover sheet of the Motion, and the Attorney Electronic Submission Form.
4. The opposing counsel/party has two (2) calendar days from submission to respond to an expedited Motion.
5. Judge Wrenna Watson prefers a response that is in a “motion” format, instead of a traditional “civil” answer format (i.e.: only stating “admitted” or “denied” to the averments in the Motion). Be specific in your response. Tell the story as to why the motion should be denied.

VI. HEARINGS & TRIALS

- A. Unless otherwise specified, hearings and trials are in person and will take place in Courtroom 200 of the Family Law Center, 440 Ross St, Pittsburgh PA 15219.
- B. Court proceedings begin promptly at the scheduled time and generally end by 4:30 P.M. The Courts reserves the right to proceed beyond 4:30 P.M. when the case circumstances call for it.
- C. Counsel shall cooperate in scheduling expert testimony. The Court, however, reserves the right to take expert testimony out of order as it sees fit.

- D. Counsel should anticipate in difficult questions of law or evidence that will likely arise during a trial/hearing. Counsel shall communicate with opposing counsel on the topic and should supply the Court with a memorandum of law on the issue. A memorandum from counsel should be filed no later than 48 hours before trial/hearing.
- E. When documents are to be discussed and/or presented to the court, counsel shall provide copies to opposing counsel and to the Court. Except in unusual circumstances. The Court 's staff will not make copies. Exhibits should be pre-marked.
- F. Everyone entering Judge Watson's courtroom will be treated with respect and thus expects the same level of respect from anyone who enters.
- G. All electronic devices shall be turned off or placed on silent.
 - i. If a device goes off during court, the owner of said device will be subject to a fine not less than \$50.
- H. Only attorneys at counsel table are permitted to use laptop computers. If you need to use your cell phone or electronic device, please quietly leave the courtroom.
- I. The reading of the newspapers or magazines in the courtroom is prohibited.
- J. If you are an attorney waiting for your case, you may quietly review your files while seated in the courtroom.
- K. Food and drink (with the exception of water) are not permitted.
- L. Appropriate dress is required. It is the responsibility of counsel to instruct their clients and witnesses on this topic. The following clothing is not appropriate: shorts, halter tops, tank tops, flip-flops, t-shirts with inappropriate imagery or writing, crop tops, pants which hang below one's waistline, hats, and hair bonnets. By no means is this an inclusive list. These are but examples. The Court may instruct one to leave courtroom if not appropriately attired.

VII. FILINGS: DEPARTMENT OF COURT RECORDS

- A. Counsel must file all original pleadings and documents with the Department of Court Records/Family Division (DCR). These should be filed electronically.

1. Per filing rules, exhibits must be filed electronically utilizing the eFiling and Retrieval System at the Department of Court Records. Pro se litigants are encouraged to file electronically as well but the Department of Court Records accepts filing of court documents in person or by other means which may be posted on the Department of Court Records website.
 2. Be aware that once a pleading is filed, all of it, including any attachments and exhibits, will be published on the DCR website and is available for public viewing. Therefore, counsel and unrepresented parties should be careful about attaching documents containing sensitive information. Motions to seal the record -after the fact- will generally be denied absent exceptional circumstances.
- B. If you have information to file that you don't wish to be public, you should submit this information separately to opposing counsel or unrepresented parties before the hearing and to the Court at the time of the hearing. How it becomes a part of the record will then be determined at the hearing.
- C. Contents of Documents
1. In all documents submitted to the Court, the parties shall be described through use of such terms as "husband" and "wife" or "father" and "mother" as opposed to "plaintiff", "defendant", and "respondent".
 2. If in a document you reference or refer to another document, a copy of that other document shall be attached.
 3. If you rely on any authority not readily available through electronic legal databases (such as LEXIS, WESTLAW), a copy of it shall be attached to your filing.
 4. The Court may request briefing of any legal issue that may arise during a proceeding. Counsel is encouraged to bring such matters to the Court's attention as soon as possible.
 5. Exhibits submitted to the Court will be retained for 40 days after a final order is entered and no appeal is taken. After that time, if counsel or parties do not request return, the documents will be destroyed.

VIII. CHILDREN'S PARTICIPATION & TESTIMONY

- A. Children, who are not the subject of the proceedings, or have no involvement whatsoever with the litigation, should not be present in the Courtroom unless instructed otherwise by the Court.

- B. The Court will take special care when taking testimony from a child to shield the child from harassment or embarrassment. The Court will intervene to ensure that questioning is not misleading, age-inappropriate, or repetitive. The Court may permit “in Camera” Testimony from a child if appropriate.
- C. Lawyers shall form their questions in a manner appropriate for the child witness’ age or cognitive level, including the use of appropriate language, grammar, and sentence structure.
- D. Childcare/Children’s Room
 - 1. Litigants are responsible for making arrangements for childcare during court proceedings.
 - 2. If litigants need childcare for any in-person proceedings, they may use the Children’s Room located on the first floor of the Family Law Center at 440 Ross Street.
 - 3. Litigants must follow all requirements for utilizing the Children’s Room.
 - 4. If a child cannot be admitted to the Children’s Room for any reason (illness, vaccination status, etc.), it is the litigant’s responsibility to make alternative arrangements for childcare, such as having an adult sit with the child in the waiting area or outdoor play space.
 - 5. Parties can and should bring their children to the Children’s Room up to thirty (30) minutes before a proceeding is scheduled to begin and must tell the children’s room staff where they will be.
 - 6. The Children’s Room staff cannot change diapers, accept children exhibiting symptoms of illness, or accept children who are not up-to-date on their vaccinations.

IX. COURTROOM DECORUM

A. Banned Items:

- 1. No food or drink is permitted in the Courtroom, except for water in a device that is spill proof.
- 2. All cell phones should be turned off or set to silent.

B. Civility:

1. All proceedings will be conducted in a dignified and formal manner and consistent with the Rules of Civility.
2. The Court will have zero tolerance for incivility. All remarks should be addressed to the Court. Counsel should never act or speak disrespectfully to the Court, the Court's staff, or opposing Counsel.
3. Counsel shall instruct all witnesses and parties to dress and behave appropriately.

C. Presence of Parties:

1. Only counsel and parties may sit at counsel tables.
2. Counsel shall advise their client(s) that they shall not address the Court unless the Court requests them to do so.

X. TEAMS TIPS

- A. If you keep 'losing' your TEAMS invite, get in the habit of forwarding the email to yourself when you first get it. Once you 'accept' an invite, the email goes away. This way you will have a copy of the invite in your email.
- B. When you receive a TEAMS invite, you can open it and right-click on "Join the meeting." This will allow you to select the link and copy it. You can then paste it wherever you want to save it. The Court recommends that you paste it into your calendar appointment that you most likely have set up to remind you of the Conciliation or Hearing.
- C. Ideally when you 'accept' an invite, you should have your technology set up so that the TEAMS conference and all the info contained within, 'drop' into your calendar as an appointment. You would want the invite to drop into your work calendar and not a google or personal calendar on your computer, which is the default.
- D. If you receive an error message that the 'administrator has disabled video' it could be a couple of things.
 - i. If you don't have TEAMS downloaded and are using an old browser or Internet Explorer on a Windows computer, that could be it. You should use Firefox, Chrome, or Microsoft Edge, as these browsers

seem to work well. It is ALMOST ALWAYS better to download TEAMS from the Appstore than to go into TEAMS with the web browser.

- ii. You can try this workaround: open the email invite to join the TEAMS meeting. A screen will pop up saying, "Join with the app" or "Join on the web." Select "Join on the web." Then, make sure you exit out of the app because there will be an echo if both TEAMS on the web and the app are open at the same time.
 - iii. If the privacy settings under your control panel/system preferences has video or the TEAMS app disabled, TEAMS may be blocked from accessing the camera and might show that message.
 - iv. If you work for a law firm that has an IT department that manages your computer (rather than you having downloaded the App to your personal computer), your IT Department could have a license for TEAMS, and video might be disabled on your end. The Court has it enabled for anyone who wants to use it, so it's not coming from our end.
 - v. Last, if you can't get it working, you can download TEAMS for free to your phone; although it's a little smaller of a screen, it will let you get in on your phone (even without a TEAMS account—as a guest) with the “remote hearing invite” that the Court sends.
- E. If you have a cell phone, get help to set it up as a hotspot. This will provide backup in case you are kicked out of TEAMS due to high internet traffic in or around your household or office.
- F. If you can't “hear” people on a TEAMS call, check to see that TEAMS is using your computer's ‘internal speakers.’ This is a setting in the TEAMS App. If at some point, you tried to use earbuds or headphones in the past, TEAMS may recognize and switch to those devices' speakers by default without you knowing. When on your computer without other devices, you want TEAMS to use the computer's internal speakers.
- G. Another workaround when you can't ‘hear’ or when we can't ‘hear’ you is to join the call with your cell phone, and we will use that audio and the video will be from the computer with the computer's sound muted to avoid reverb.
- H. A computer will generally be preferred to a tablet or a phone.

XI. TECHNICAL TIPS

A. How TO Scan Document on an iPhone

- i. Open Notes and select a note or create a new one.
- ii. Tap the Camera button, then tap Scan Documents.
- iii. Place your document in view of the camera.
- iv. If your device is in Auto mode, your document will automatically scan. If you need to manually capture a scan, tap the Shutter button, or press one of the Volume buttons. Then drag the corners to adjust the scan to fit the page, then tap Keep Scan.
- v. Tap Save or add additional scans to the document.