



**Standard Operating Procedures
For Civil Division
Judge Nicola Henry-Taylor**

(Effective May 12, 2026)

**City-County Building
414 Grant Street, Room 712
Pittsburgh, PA 15219
(412) 350-1670**

Table of Contents

PART 1. INTRODUCTION AND AUTHORITY	6
PART 2. COURT STAFF AND CONTACT INFORMATION	6
PART 3. GENERAL PROCEDURES AND COURT POLICIES	7
PART 4. COMMUNICATION WITH THE COURT	7
I. GENERAL RULE.....	7
II. PROHIBITION ON EX PARTE COMMUNICATION	7
III. EMAIL PROCEDURES	7
IV. COURTESY COPIES.....	8
V. MANDATORY CONTACT INFORMATION	8
PART 5. PROHIBITION ON RECORDING.....	8
PART 6. RESOURCES FOR SELF-REPRESENTED LITIGANTS	9
PART 7. PURPOSE AND SCOPE.....	10
PART 8. GENERAL CONSIDERATIONS FOR ALL PROCEEDINGS	10
I. REMOTE PARTICIPATION	10
II. COURTROOM AND REMOTE DECORUM	10
III. INTERPRETERS AND ADA ACCOMMODATIONS	11
IV. CONTINUANCES	11
V. SANCTIONS	12
PART 9. PRE-TRIAL PROCEDURES	12
I. PRE-TRIAL SCHEDULING ORDERS	12
II. SETTLEMENT AND ADR EXPECTATIONS	13
III. DISPOSITIVE MOTIONS	13
IV. PRE-TRIAL STATEMENTS	13
V. MOTIONS IN LIMINE.....	13
VI. PRE-TRIAL CONFERENCES.....	14
VII. WITNESS LISTS.....	14
VIII. JOINT POINTS FOR CHARGE AND VERDICT SLIP	14
IX. EXPERT DISCLOSURES	15
X. EXHIBIT EXCHANGE.....	15
XI. TRIAL BRIEFS.....	15

PART 10. TRIAL PROCEDURES	15
I. ARRIVAL AND SCHEDULING	15
II. PRE-TRIAL CONFERENCE ON TRIAL DAY	16
III. SEQUESTRATION	16
IV. OPENING STATEMENTS	16
V. PRESENTATION OF EVIDENCE	16
VI. DEPOSITIONS	17
VII. OBJECTIONS	17
VIII. SIDEBARS	17
IX. TECHNOLOGY AND DEMONSTRATIVES	17
X. WITNESS SCHEDULING	17
XI. WITNESSES IDENTIFIED LATE	17
XII. JURY TRIALS	18
XIII. WAIVER OF JURY TRIALS	18
XIV. CLOSING ARGUMENTS	18
PART 11. EXHIBITS	18
I. PRE-MARKING OF EXHIBITS	18
II. EXCHANGE OF EXHIBITS	19
III. EXHIBIT BINDERS	19
IV. ELECTRONIC EXHIBITS	19
V. ADMISSION OF EXHIBITS AT TRIAL	19
VI. OBJECTIONS	20
VII. OVERSIZED OR PHYSICAL EXHIBITS	20
VIII. CUSTODY AND RETURN OF EXHIBITS	20
IX. DEMONSTRATIVE AIDS	20
X. ADVANCE ISSUES	20
PART 12. POST-TRIAL MOTIONS AND APPEALS	21
I. VERDICT AND JUDGMENT	21
II. FILING POST-TRIAL MOTIONS	21
III. TRANSCRIPT REQUESTS	21
IV. RESPONSES	21

V. ORAL ARGUMENT	21
VI. DISPOSITION OF MOTIONS	21
VII. ENTRY OF JUDGMENT	22
VIII. PRESERVATION FOR APPEAL.....	22
IX. APPEALS	22
X. RULE 1925(b) STATEMENTS	22
XI. SIJ-SPECIFIC APPELLATE CONCERNS.....	22
PART 13. GENERAL MOTIONS PRACTICE.....	22
I. FILING AND SERVICE REQUIREMENTS.....	22
II. IN-PERSON PRESENTATION	23
III. WITHDRAWAL OF COUNSEL	23
IV. ATTORNEY’S FEES	24
V. SUPPORTING DOCUMENTATION	24
VI. MEET-AND-CONFER REQUIREMENT	24
VII. REPONSES TO MOTIONS.....	24
VIII. NEW MATTER	25
IX. CONTESTED MOTIONS.....	25
X. UNCONTESTED MOTIONS	25
XI. EMERGENCY MOTIONS.....	25
PART 14. HOUSING COURT PROCEDURES.....	25
I. FILING AND SERVICE	26
II. HOUSING COURT MOTIONS.....	26
III. REQUIRED SUPPORTING DOCUMENTATION	26
IV. MEET-AND-CONFER REQUIREMENT	27
V. SETTLEMENTS	27
VI. FAILURE TO APPEAR	28
PART 15. SAVE YOUR HOME (SYH) PROGRAM	28
I. ASSIGNMENT AND SCHEDULING	28
II. REPRESENTATION AND CONTACT UPDATES	28
III. REQUIRED DOCUMENTATION	29
IV. RETURN TO CIVIL DIVISION DOCKET	29

V. POST-SYH SETTLEMENT PROCEDURE.....	29
PART 16. SPECIAL IMMIGRANT JUVENILE (SIJ) PROCEDURES.....	30
I. NATURE AND PURPOSE OF SIJ PROCEEDINGS.....	30
II. FILING REQUIREMENTS	31
III. SERVICE OF PROCESS	31
IV. TRAUMA-INFORMED PRACTICES.....	31
V. EVIDENCE REQUIRED	31
VI. HEARINGS.....	32
VII. ORDERS AND FINDINGS	32
VIII. CONFIDENTIALITY	32
IX. POST-HEARING PROCEDURES	32
X. SANCTIONS	32
PART 17. TECHNOLOGY AND ELECTRONIC MATERIALS.....	32
I. USE OF COURTROOM TECHNOLOGY.....	32
II. ELECTRONIC EXHIBITS	33
III. SCREEN SHARING	33
IV. ELECTRONIC SIGNATURES AND FILING.....	33
V. CYBERSECURITY AND CONFIDENTIALITY	33
VI. TECHNOLOGY FAILURES	33
VII. MISCELLANEOUS TECHNICAL TIPS	33

PART 1. INTRODUCTION AND AUTHORITY

These Standard Operating Procedures (“SOPs”) govern all matters assigned to the Honorable Nicola Henry-Taylor of the Fifth Judicial District of Pennsylvania, Civil Division. They are issued pursuant to the Court’s inherent authority to regulate proceedings before it and to ensure the fair, efficient, and orderly administration of justice.

These SOPs supplement, but do not supersede:

- The Pennsylvania Rules of Civil Procedure
- The Pennsylvania Rules of Evidence
- The Pennsylvania Rules of Judicial Administration
- The Allegheny County Local Rules
- All Administrative Orders
- Applicable statutory authority, including provisions governing Special Immigrant Juvenile (“SIJ”) findings

Where a conflict exists, statewide rules and statutes control. All attorneys and self-represented litigants are expected to be familiar with these SOPs and to fully comply with them.

PART 2. COURT STAFF AND CONTACT INFORMATION

Chambers Address City-County Building, Room 712 414 Grant Street Pittsburgh, PA 15219 Phone: (412) 350-1670	Judicial Assistant Taylor Bowman tbowman@allegheycourts.us (412) 350-1670
Law Clerk Samantha Dorn, Esquire sdorn@allegheycourts.us (412) 350-1672	Tipstaff Madasen Dowling mdowling@allegheycourts.us (412) 350-1673
General Chambers Email – henry-taylorchambers@allegheycourts.us	
Motions Email – henry-taylormotions@allegheycourts.us	

Communications sent to individual staff emails outside the designated inboxes may not be answered.

PART 3. GENERAL PROCEDURES AND COURT POLICIES

- A. All filings must comply with:
 - 1. The Pennsylvania Rules of Civil Procedure;
 - 2. Allegheny County Local Rules;
 - 3. Case Records Public Access Policy; and
 - 4. Requirements for confidential information and documents.
- B. Forms, cover sheets, Praecipes, and local procedural resources are available at <https://www.alleghencourts.us/civil/forms/>.
- C. **Professionalism, civility, and respect are expected from all participants at all times. Failure to adhere to courtroom decorum or procedural rules may result in sanctions.**

PART 4. COMMUNICATION WITH THE COURT

I. GENERAL RULE

- A. The Court cannot act on any request unless it is properly filed with the Department of Court Records (DCR). The Court does not accept or act on requests submitted by email, voicemail, letter, or informally.

II. PROHIBITION ON EX PARTE COMMUNICATION

- A. The Judge and Court staff may not receive or review any communication regarding the substance of a pending case unless all parties are included.
- B. Permissible communication includes only:
 - 1. Scheduling inquiries;
 - 2. Administrative questions;
 - 3. Procedural questions; and
 - 4. Communications expressly authorized by rule or Order of Court.

III. EMAIL PROCEDURES

- A. All emails must:
 - 1. Be sent to the correct inbox;
 - 2. Copy all counsel and self-represented parties; and
 - 3. Never use blind-copying (“BCC”).

B. Substantive issues must be raised by motion, not email.

IV. COURTESY COPIES

A. Courtesy copies are **required** for any proceedings scheduled before Judge Henry-Taylor.

B. They must be sent via email **simultaneously** with serving the document upon the opposing party.

C. The subject line must read: “Courtesy Copy — Chambers.”

V. MANDATORY CONTACT INFORMATION

A. All filings must include counsel’s or party’s:

1. Name;
2. Physical/Mailing Address;
3. Email Address; and
4. Phone Number.

PART 5. PROHIBITION ON RECORDING

No person may photograph, record, stream, capture, or retransmit any proceeding—whether in-person or remote—without express permission of the Court.

This includes:

- Audio recordings;
- Video recordings;
- Screenshots;
- Screen recordings; and
- Broadcasts on any platform.

Recording in court and during proceedings is prohibited by both Fifth Judicial District Policy and Pennsylvania statute. **Violations may result in contempt proceedings and referral for criminal prosecution.**

PART 6. RESOURCES FOR SELF-REPRESENTED LITIGANTS

THESE RESOURCES ARE NOT A SUBSTITUTE FOR INDEPENDENT LEGAL ADVICE



Carnegie Library Legal Resource Guide:



Provides basic information on civil matters

Neighborhood Legal Services:



Can apply for free legal representation, must meet income requirements

Pennsylvania Legal Aid Network:



Apply for free legal aid or private attorney

Pennsylvania Utility Law Project:



Can provide free legal assistance for those with utility issues

Landlord Tenant Clinic
Thomas R. Kline School of Law of Duquesne University:
Call: 412-396-4704
Lawclinic@duq.edu
Assist with landlord/tenant disputes:
eviction, security deposit disputes, and Section 8 housing matters

PART 7. PURPOSE AND SCOPE

These Standard Operating Procedures (SOPs) apply to:

- All civil actions;
- Housing Court matters;
- Mortgage foreclosure cases returning from the Save Your Home (SYH) Program;
- Matters requiring SIJ findings; and
- All motions, hearings, conferences, and trials before Judge Henry-Taylor.

These SOPs ensure fairness, efficiency, clarity, and trauma-informed practice where required.

PART 8. GENERAL CONSIDERATIONS FOR ALL PROCEEDINGS

The provisions in this section applies to all proceedings before Judge Henry-Taylor, including Housing Court and Save Your Home matters.

I. COURTROOM AND REMOTE DECORUM

- A. It should be presumed that all proceedings will be **in-person**, unless otherwise permitted or ordered by the Court.
- B. Requests for remote appearance require the following:
1. A written request to chambers and/or Motion;
 2. A statement of good cause for remote appearance;
 3. Confirmation regarding whether the request is opposed by the other side; and
 4. A proposed order in Word format.
- C. The following are prohibited during **both in-person and remote proceedings**:
1. Driving a vehicle;
 2. Smoking, eating, and drinking beverages other than water;
 3. Use of public spaces;
 4. Private, off-camera communication; and
 5. Recording.
- D. Civility and professional conduct are required **at all times**. See Pennsylvania Code of Civility (204 Pa. Code § 99.1-99.3).

1. Everyone entering Judge Henry-Taylor’s Courtroom will be treated with dignity and respect and Judge Henry-Taylor expects anyone who enters the Courtroom to be respectful.
 2. All individuals appearing before the Court shall be addressed by their last names and appropriate titles (e.g., Mr., Ms., Dr., Principal, Counsel), rather than by generic descriptors such as “landlord,” “tenant,” or “borrower.” This practice is intended to promote professionalism, reinforce the dignity of the proceedings, and ensure that every person is treated with respect as an individual rather than defined solely by their role in the litigation.
 3. Parties and counsel shall be dressed appropriately.
 4. Counsel shall not engage in colloquy with each other or the opposing party.
 5. All arguments and comments shall be directed to the Court.
- E. **Remote appearance is a courtesy provided by the Court, not a right.** All participants must maintain decorum consistent with the dignity of judicial proceedings.
1. For proceedings that are permitted to be conducted remotely, participants must appear on camera in a professional environment.
 2. If a participant is unable or unwilling to comply with the requirements of remote appearance, the participant may be ordered to appear in person on a separate date.

II. INTERPRETERS AND ADA ACCOMMODATIONS

- A. Requests must be emailed as early as possible before the proceeding to the following:
1. courtaccess@allegheycourts.us; and
 2. Henry-taylorchambers@allegheycourts.us.
- B. Requests for Interpreters, particularly for American Sign Language (ASL) or a less commonly spoken language, may need to be made as early as eight (8) weeks in advance of a proceeding to ensure interpreter availability.

III. CONTINUANCES

- A. Requests for continuance (postponement of proceeding) require a written motion stating the following:
1. The reason for the continuance;
 2. Confirmation regarding whether the request is opposed by the other side; and
 3. A proposed order in Word format.

IV. SANCTIONS

- A. Failure to comply with the requirements in any Order of Court or these Standard Operating Procedures may result in appropriate and proportional sanctions, including but not limited to:
1. Waiver or preclusion of issues;
 2. Dismissal of motions;
 3. Preclusion of exhibits or witness testimony;
 4. Termination of remote appearances;
 5. Adverse inferences being raised against the non-compliant party;
 6. Finding of contempt;
 7. Adverse rulings against the non-compliant party;
 8. Monetary sanctions; and/or
 9. Other sanctions permitted by law.
- B. Sanctions may be issued upon motion or *sua sponte*.

PART 9. PRE-TRIAL PROCEDURES

The provisions in this section applies to all proceedings before Judge Henry-Taylor, including Housing Court and Save Your Home matters.

I. PRE-TRIAL SCHEDULING ORDERS

- A. The Court will issue a scheduling order setting deadlines for:
1. Discovery;
 2. Dispositive motions;
 3. Pretrial statements;
 4. Expert reports;
 5. ADR;
 6. Trial dates; and
 7. Any other relevant matters, such as stipulations
- B. **Where a Trial Management Order is issued, it supplements and may modify these Standard Operating Procedures. In the event of a conflict, the Trial Management Order controls.**
- C. When a case is on a published trial list, or attached for trial, deadlines may be accelerated by Order of Court. **Counsel are expected to be trial ready.**

II. SETTLEMENT AND ADR EXPECTATIONS

- A. Where ordered, parties must engage in settlement discussions and participate in:
1. Mediation;
 2. Neutral evaluation; and/or
 3. Settlement conferences.

III. DISPOSITIVE MOTIONS

- A. All briefing must comply with Pa.R.C.P. 1035.2.
- B. Summary Judgment motions must include concise statements of material facts.

IV. PRE-TRIAL STATEMENTS

- A. Each party must file a comprehensive Pre-Trial Statement including:
1. Proposed exhibits;
 2. Witness lists;
 3. Expert reports;
 4. Damages calculations; and
 5. Stipulations.
- B. Amended Pre-Trial Statements must contain all of the language from the original pleading.

V. MOTIONS IN LIMINE

- A. Motions in Limine must be:
1. Filed before the deadline:
 - i. For Housing Court (LT-) Jury and Non-Jury trials:
 1. The deadline to file is no later than (10) business days prior to trial.
 2. Responses shall be filed no later than five (5) business days prior to trial.
 3. If there is an anticipated evidentiary issue, parties may submit a Motion in Limine with their Pre-Trial Statement.
 - ii. For all other Jury and Non-Jury Trials:
 1. The deadline to file is no later than 12:00 p.m. on the first business day following the entry of the Trial Management Order.
 2. Responses shall be filed no later than 9:00 a.m. on the day before jury selection. If the matter is a non-jury trial, Responses shall be filed no later than 9:00 a.m. on the day before trial begins.

2. Served on all opposing parties; and
 3. Presented at the Pre-Trial conference unless otherwise directed.
- B. Motions in Limine and other pre-trial motions shall include a Certificate of Concurrence certifying that counsel has conferred with opposing counsel and stating whether the relief requested is consented to, opposed, or unopposed.
1. Motions filed without a Certificate of Concurrence may be denied as procedurally defective.
- C. Absent extraordinary cause, no motions shall be entertained during trial.

VI. PRE-TRIAL CONFERENCES

- A. Counsel must attend Pre-Trial Conferences with an individual who has settlement authority.
- B. All parties should be fully prepared to discuss:
1. Issues for trial;
 2. Evidentiary concerns; and
 3. Remaining discovery disputes.

VII. WITNESS LISTS

- A. Witness lists must include:
1. Full names;
 2. Contact information; and
 3. Summaries (proffers) of anticipated testimony.
- B. Rebuttal witnesses are not required to be in the witness list.

VIII. JOINT POINTS FOR CHARGE AND VERDICT SLIP

- A. Counsel MUST confer in good faith and submit Joint Points for Charge and a Joint Proposed Verdict Slip.
- B. No later than 4:00 p.m. on the day before jury selection, counsel shall submit to Chambers, in editable Word format, the following:
1. jointly agreed-upon standard points for charge by citation to the applicable Pennsylvania Suggested Standard Civil Jury Instructions;
 2. any jointly proposed non-standard points with supporting authority; and
 3. any disputed points clearly identified with each party's position concisely stated and supported by authority.

- C. Counsel shall also submit a single joint proposed verdict slip addressing all claims and defenses, identifying any disputed interrogatories or language with a brief statement of each party's position.
- D. Absent extraordinary cause, the Court will not entertain argument during trial regarding jury instructions or verdict slip language that could have been raised through compliance with the Trial Management Order.

IX. EXPERT DISCLOSURES

- A. Expert reports must comply with Pa.R.C.P. 4003.5.

X. EXHIBIT EXCHANGE

- A. Exhibits must be exchanged before trial.

XI. TRIAL BRIEFS

- A. Trial briefs are required when ordered by the Court or pursuant to a Trial Management Order.

PART 10. TRIAL PROCEDURES

The provisions in this section applies to all proceedings before Judge Henry-Taylor, including Housing Court and Save Your Home matters.

Trial dates are valuable resources for the Court. Parties and counsel should not use trial dates as a “placeholder” for settlement.

I. ARRIVAL AND SCHEDULING

- A. Trials begin promptly at the time scheduled.
- B. Parties must appear at least fifteen (15) minutes early.
- C. Entry into the courtroom shall occur only after checking in with the Tipstaff or other authorized judicial staff, including the Law Clerk or Judicial Assistant.
 - 1. No party or counsel shall enter the courtroom unless and until directed to do so by authorized judicial staff.

- D. All parties, counsel, and witnesses shall appear in person for trial unless prior leave of court is granted to permit testimony by Microsoft Teams or Zoom.

II. PRE-TRIAL CONFERENCE ON TRIAL DAY

- A. Although the Court may conduct a brief conference on the date of trial to address limited outstanding matters, it is the expectation of the Court that substantive issues will be resolved in advance and that all deadlines within Pre-Trial/Case Management Orders, the Local Rules, and the Pennsylvania Rules of Civil Procedure, will be strictly followed.
- B. At the commencement of trial, the Court may conduct a brief conference to:
 - 1. Address limited last-minute issues;
 - 2. Resolve any pending motions properly raised in advance;
 - 3. Confirm witness availability and order of presentation; and
 - 4. Finalize exhibit procedures in accordance with the Court's Exhibit Requirement.
- C. Failure to comply with deadlines may result in waiver, preclusion, or other appropriate action by the Court.
- D. If procedural or evidentiary matters more appropriate for pre-trial resolution are not raised in advance of trial, those issues may be deemed waived and will not be entertained during trial.
- E. If parties do not raise issues that must be raised contemporaneously during trial to preserve appellate rights, those issues may also be deemed waived upon an appeal.

III. SEQUESTRATION

- A. Witness sequestration may be ordered under Pa.R.E. 615.

IV. OPENING STATEMENTS

- A. Opening statements must be confined to what counsel expects the evidence to prove.

V. PRESENTATION OF EVIDENCE

- A. Evidence must comply with the Pennsylvania Rules of Evidence.
- B. The Court may impose limits to avoid cumulative testimony.

VI. DEPOSITIONS

- A. Depositions may be used as permitted under Pa.R.C.P. 4020.
- B. All objections to deposition testimony or video depositions shall be identified, conferred upon, and resolved no later than 12:00 p.m. on the day before jury selection.
- C. Any unresolved objections shall be narrowly identified in writing, accompanied by each party's position and supporting authority, and submitted to Chambers by that deadline.
- D. The party intending to use the deposition shall provide the Court with a clean transcript, a marked transcript reflecting agreed-upon deletions and unresolved objections, and any edited video deposition prepared for presentation.
- E. Absent extraordinary cause, the Court will not resolve deposition disputes during trial.

VII. OBJECTIONS

- A. Objections must be concise and should only state the legal reason for the objection (e.g., "Objection, hearsay." Or "Objection, relevance.")
- B. Speaking objections are not permitted.
 - 1. A speaking objection happens when a person goes beyond stating the legal reason and begins arguing, explaining, or commenting on the record in open court.

VIII. SIDEBARS

- A. Sidebar requests are granted sparingly.

IX. TECHNOLOGY AND DEMONSTRATIVES

- A. **See Part 17 – Technology, Remote Proceedings, and Electronic Materials.**

X. WITNESS SCHEDULING

- A. Counsel must coordinate witness availability to avoid delays.

XI. WITNESSES IDENTIFIED LATE

- A. Late-disclosed witnesses may be excluded absent good cause.

XII. JURY TRIALS

- A. All jury instructions, voir dire questions, and proposed verdict slips must be submitted as ordered.

XIII. WAIVER OF JURY TRIALS

- A. Parties shall comply with Pa.R.C.P. 1007.1 (regarding written demands for jury trials).
- B. Failure to file to timely file and serve this demand waives the right to a jury trial.

XIV. CLOSING ARGUMENTS

- A. Closing arguments must be based on admitted evidence.

PART 11. EXHIBITS

The provisions in this section applies to all proceedings before Judge Henry-Taylor, including Housing Court and Save Your Home matters.

All exhibits must be organized, pre-marked, exchanged, and presented in compliance with these procedures. The purpose of these rules is to ensure fairness, clarity, and efficiency during hearings and trials.

Please refer to Allegheny County Rules of Judicial Administration, Rule 5101.1, et. seq. regarding custody of exhibits and filing requirements.

I. PRE-MARKING OF EXHIBITS

- A. All exhibits must be pre-marked before trial or evidentiary hearings. Rebuttal exhibits do not need to be identified prior to trial.
- B. Plaintiffs shall use “P-1,” “P-2,” “P-3,” etc.
- C. Defendants shall use “D-1,” “D-2,” “D-3,” etc.
- D. Joint exhibits, when permitted, shall be marked “J-1,” “J-2,” “J-3.”
- E. Large or physical exhibits must also be labeled with the exhibit number.

II. EXCHANGE OF EXHIBITS

- A. Exhibits must be exchanged:
 - 1. By the deadline set forth in the Pre-Trial/Case Management Order, or
 - 2. If no deadline is set, no later than five (5) business days before trial.
- B. Failure to exchange exhibits may result in exclusion.
- C. Rebuttal exhibits do not need to be exchanged prior to trial.

III. EXHIBIT BINDERS

- A. For trials exceeding one (1) day, each party must prepare:
 - 1. One (1) binder for the Court,
 - 2. One (1) binder for witnesses, and
 - 3. One (1) binder for opposing counsel.
- B. Binders must:
 - 1. Be tabbed;
 - 2. Match the numbering in the exhibit index; and
 - 3. Contain only pre-marked exhibits.

IV. ELECTRONIC EXHIBITS

- A. Electronic exhibits must:
 - 1. Be submitted as PDF files, unless the exhibits are audio or video;
 - 2. Be clearly labeled by exhibit number and/or letter(s); and
 - 3. Be listed on the Exhibit Index within the Exhibit Binder.
- B. Audio and video files must be playable on standard Windows-based courtroom systems.
- C. Counsel must test the files in advance of trial and coordinate with the Judicial Tipstaff.

V. ADMISSION OF EXHIBITS AT TRIAL

- A. Pre-marked exhibits are not automatically admitted.
- B. Exhibits must be moved into evidence through a sponsoring witness (or by consent).
- C. Opposing counsel will have an opportunity to object.
- D. The Court will rule on admissibility consistent with the Rules of Evidence.

VI. OBJECTIONS

- A. All objections to exhibits must be:
 - 1. Concise;
 - 2. Based on the Rules of Evidence; and
 - 3. Raised prior to admission.
- B. Speaking objections are prohibited.

VII. OVERSIZED OR PHYSICAL EXHIBITS

- A. Oversized or three-dimensional exhibits:
 - 1. Must be disclosed in advance;
 - 2. Must be delivered to the courtroom by 8:30 a.m. on the first day of trial;
 - 3. May require special handling or storage.
- B. The Court may decline to store exhibits that pose a safety or logistical issue.
- C. Coordination with the Judicial Tipstaff is required.

VIII. CUSTODY AND RETURN OF EXHIBITS

- A. Exhibits admitted into evidence become part of the court record.
- B. Counsel must retrieve physical exhibits at the conclusion of trial unless otherwise ordered.

IX. DEMONSTRATIVE AIDS

- A. Demonstrative exhibits must be:
 - 1. Shared with opposing counsel in advance;
 - 2. Not misleading; and
 - 3. Clearly marked “Demonstrative Only – Not Admitted.”
- B. Counsel must request permission before displaying demonstratives to the jury or the Court.

X. ADVANCE ISSUES

- A. Any disputes regarding exhibits must be raised at the Pre-Trial Conference or by written motion filed before trial.

PART 12. POST-TRIAL MOTIONS AND APPEALS

The provisions in this section applies to all proceedings before Judge Henry-Taylor, including Housing Court and Save Your Home matters.

This section governs the procedures for post-trial relief, preservation of issues, and appeals.

I. VERDICT AND JUDGMENT

- A. Following a bench or jury trial, the Court will enter a verdict or order.
- B. Judgment shall be entered as required under Pa.R.C.P. 227.4.

II. FILING POST-TRIAL MOTIONS

- A. Post-Trial Motions under Pa.R.C.P. 227.1 must:
 - 1. Be filed within ten (10) days of the verdict or decision;
 - 2. Identify specific issues raised at trial;
 - 3. Cite legal authority;
 - 4. Include a proposed order; and
 - 5. Not include new issues not preserved at trial.

III. TRANSCRIPT REQUESTS

- A. If transcripts are needed, a request must be filed promptly with the Court Reporter's Office.
- B. Counsel must serve all parties.
- C. Any delays attributable to counsel may not extend briefing deadlines.

IV. RESPONSES

- A. Responses to Post-Trial Motions must be filed within the timeframe set by local rule or Court order.

V. ORAL ARGUMENT

- A. The Court may schedule oral argument or decide the motion on the pleadings.

VI. DISPOSITION OF MOTIONS

- A. The Court will issue an opinion and/or order addressing each issue raised.

VII. ENTRY OF JUDGMENT

- A. After Post-Trial Motions are resolved, any party may praecipe for entry of judgment as required.

VIII. PRESERVATION FOR APPEAL

- A. Issues not raised at trial and in Post-Trial Motions are generally waived on appeal.

IX. APPEALS

- A. Appeals to the Superior Court must comply with:
 1. The Pennsylvania Rules of Appellate Procedure;
 2. Requirements for Rule 1925(b) Statements; and
 3. Timely ordering of transcripts.

X. RULE 1925(b) STATEMENTS

- A. If the Court orders a party to complete and file a Rule 1925(b) statement, the party must comply strictly with the order.
- B. Failure to file a timely, concise statement may result in waiver.

XI. SIJ-SPECIFIC APPELLATE CONCERNS

- A. For matters involving Special Immigrant Juvenile findings, the Court will issue a Rule 1925(a) Opinion, if needed.
- B. Federal immigration deadlines do not toll state appellate deadlines.

PART 13. GENERAL MOTIONS PRACTICE

All Motions must comply with the Pennsylvania Rules of Civil Procedure, the Allegheny County Local Rules, and these SOPs. The Court expects all filings to be complete, timely, and properly served.

I. FILING AND SERVICE REQUIREMENTS

- A. All motions must be filed with the Department of Court Records (DCR) before presentation.

- B. A Notice of Presentation must accompany any motion scheduled for argument.
- C. The motion must be served on all parties contemporaneously with filing.
- D. Proof of service must be included.
- E. Judge Henry-Taylor REQUIRES courtesy copies of all Motions and Preliminary Objections scheduled to be heard at General Motions before her. They must be submitted to henry-taylormotions@alleghencourts.us no later than seven (7) days prior to the presentation date.
- F. Motions submitted directly to chambers without DCR filing will not be considered.
- G. Orders of Court must have the undersigned's name (The Honorable Nicola Henry-Taylor) listed under the signature line of all proposed orders.
- H. Motions or Preliminary Objections that fail to comply with the applicable Local Rules governing presentation before the General Motions Court will not be heard on the day Judge Henry-Taylor is presiding as the General Motions Judge.

II. IN-PERSON PRESENTATION

- A. Unless otherwise permitted, motions must be presented in person in Motions Court or during the scheduled presentation time.
- B. Remote presentation is allowed only with prior approval. **See Part 8, General Considerations for All Proceedings, Section I – Remote Participation.**

III. WITHDRAWAL OF COUNSEL

- A. Motions to Withdraw as Counsel must:
 - 1. State whether the client consents;
 - 2. Provide the client's last known address, phone number, and email address;
 - 3. Identify all upcoming deadlines and proceedings;
 - 4. Certify compliance with Pa.R.C.P. 1012; and
 - 5. Be personally served on the client when required.
- B. The Court will not grant withdrawal motions that jeopardize trial readiness or prejudice the parties.
- C. **Counsel is expected to participate in proceedings until and unless the Court grants leave to withdraw.**

IV. ATTORNEY'S FEES

- A. Motions seeking attorney fees must include:
 - 1. The statutory or contractual basis for the request;
 - 2. Time records;
 - 3. Hourly rates for attorneys and support staff;
 - 4. Certification of reasonableness; and
 - 5. Supporting affidavits or billing statements.

- B. Failure to provide adequate documentation may result in denial.

V. SUPPORTING DOCUMENTATION

- A. All factual assertions must be supported by:
 - 1. Exhibits;
 - 2. Affidavits;
 - 3. Declarations; and/or
 - 4. Records.

- B. Unsupported allegations will not be considered.

- C. An evidentiary hearing may be needed if the factual assertions and supporting documentation is not sufficient for the Court to make a decision.

VI. MEET-AND-CONFER REQUIREMENT

- A. All contested motions must include a certification that counsel conferred or attempted to confer in good faith.

- B. The certification must:
 - 1. Identify the date(s) of the conference;
 - 2. Summarize efforts made, such as through letters, emails, or phone calls; and
 - 3. State whether an agreement was reached.

VII. RESPONSES TO MOTIONS

- A. Responses to Motions are not required under Allegheny County Local Rules.

- B. If a Response to a Motion is filed, it must:
 - 1. Conform to any requirements within the Allegheny County Local Rules;
 - 2. Admit or deny factual allegations;
 - 3. Clearly identify contested issues; and
 - 4. Include supporting documentation.

VIII. NEW MATTER

- A. New issues raised for the first time in a response may be disregarded.
- B. Any additional relief sought must be raised by cross-motion.

IX. CONTESTED MOTIONS

- A. Contested motions will be scheduled for argument, unless the Court determines that a hearing is necessary.
- B. The Court may require:
 - 1. Supplemental briefs;
 - 2. Joint statements of issues; and/or
 - 3. Proposed orders.

X. UNCONTESTED MOTIONS

- A. Uncontested motions must include certification stating:
 - 1. All parties have been notified; and
 - 2. No party objects.

XI. EMERGENCY MOTIONS

- A. Emergency motions must:
 - 1. Be clearly labeled “EMERGENCY”;
 - 2. State the specific nature of the emergency;
 - 3. Explain why immediate relief is necessary;
 - 4. Certify efforts to notify all parties; and
 - 5. Include a proposed order.

PART 14. HOUSING COURT PROCEDURES

Housing Court matters require strict compliance with the Allegheny County Local Rules, and these SOPs.

If you have questions about your case, Housing Court forms, or Housing Court Motions, you may email the Housing Court Help Desk at HCHelpdesk@alleghecourts.us or call 412-350-4462. Please include your full name, phone number, and case number (if

applicable) in your messages with the Help Desk. Failure to include this information may result in the Help Desk being unable to respond to your message.

I. FILING AND SERVICE

A. All filings must:

1. Comply with landlord-tenant procedural rules;
2. Include complete lease copies where applicable; and
3. Attach payment ledgers or account histories.

II. HOUSING COURT MOTIONS

A. Judge Henry-Taylor's Housing Court Motions are conducted via video. **All litigants and counsel must appear via video on Microsoft Teams or Zoom, unless permission is granted by the Court to appear by phone only.**

III. REQUIRED SUPPORTING DOCUMENTATION

A. Required Exhibits for Evidentiary Hearings and Trials

1. Parties shall list all proposed exhibits in their Pretrial Statement and shall comply fully with the Court's Exhibit Section, including advance submission of the required exhibit binder.

B. Parties must bring sufficient copies of all exhibits they intend to introduce into evidence, including but not limited to:

1. Lease agreements, addenda, and applicable rules or policies;
2. Written notices (including notices to quit, demand letters, or other statutory notices);
3. Account ledgers;
4. Receipts and/or bank records reflecting payments;
5. Copies of money orders;
6. Correspondence, including letters, text messages, and emails, documenting payment or nonpayment;
7. Photographs;
8. Inspection reports; and
9. Any other communications or documents relevant to the issues in dispute.

- C. Failure to identify exhibits in the Pre-Trial Statement or to timely provide the required exhibit binder may result in preclusion of the undisclosed or noncompliant exhibits at hearing or trial.

IV. MEET-AND-CONFER REQUIREMENT

A. Pre-Hearing Resolution Requirement

- 1. Landlords and tenants shall make a good-faith effort to resolve the dispute prior to appearing in court.

B. Certification of Good-Faith Efforts

- 1. In cases where both parties are represented by counsel, counsel shall confer in good faith prior to the scheduled proceeding in an effort to resolve or narrow the issues.
- 2. A written Certification of Good-Faith Efforts shall be filed in accordance with the Court's Pre-Trial procedures.
- 3. If the parties enter into a consent order resolving the case, no Certificate of Good Faith efforts is required.

C. Status Conferences

- 1. When appropriate, and as the Court's schedule permits, the Court may schedule a Status Conference to review the posture of the case, address outstanding issues, and determine whether further proceedings are necessary.

V. SETTLEMENTS

A. Any settlement must be:

- 1. Written;
- 2. Signed by all parties and counsel; and
- 3. Presented to the Court for approval.

B. Final Settlements must include the following language:

- 1. No further proceedings shall be scheduled for this matter.
- 2. This is a FINAL Order. Rule 236 Notice to be sent to all parties.

C. Consent Settlement Orders, whether final or interim, must expressly state in the title and/or body of the Order that the Order is entered by consent of all parties and/or their counsel.

D. Settlement Agreements or Final Consent Orders shall be emailed to henry-taylorchambers@alleghenycourts.us.

VI. FAILURE TO APPEAR

A. Failure to appear may result in:

1. Dismissal with prejudice;
2. Entry of judgment; and
3. Issuance of warrants in contempt proceedings where applicable.

PART 15. SAVE YOUR HOME (SYH) PROGRAM

The SYH program provides mediation opportunities for litigants in mortgage foreclosure cases.

I. ASSIGNMENT AND SCHEDULING

- A. Cases may be assigned to SYH upon filing for foreclosure, or by presenting a Motion in General Motions.
- B. A Conciliation Conference will be scheduled by the Court.
- C. All inquiries regarding SYH scheduling must be directed to SYH staff, **not** the Judge's chambers.
- D. All parties must attend and engage in good-faith participation.
- E. Judge Henry-Taylor's Save Your Home Conciliations are conducted via video. **All litigants and counsel must appear via video on Microsoft Teams or Zoom.**

II. REPRESENTATION AND CONTACT UPDATES

- A. Counsel must ensure contact information is accurate and updated.
- B. Counsel shall formally enter an appearance and, once entered, shall be deemed counsel of record until:
 1. Leave of Court to withdraw is granted;
 2. A Substitution of Appearance is properly filed; or
 3. A self-represented litigant files an Entry of Appearance on their own behalf.

- C. It is expected that lenders, borrowers, and Housing Counselors will exchange contact information and documents prior to the scheduled Conciliation.

III. REQUIRED DOCUMENTATION

- A. Lenders must provide:
 - 1. Updated reinstatement quotes;
 - 2. Loss mitigation records; and
 - 3. Payment histories.

- B. Homeowners must provide:
 - 1. Income statements;
 - 2. Tax returns;
 - 3. Proof of hardship;
 - 4. Related court documentation from Orphan's Court, Family Court, and/or Bankruptcy cases; and
 - 5. Loss mitigation application materials.

IV. RETURN TO CIVIL DIVISION DOCKET

- A. Cases returning from SYH to the general document or other docket will be scheduled for Status Conferences.

V. POST-SYH SETTLEMENT PROCEDURE

- A. If the parties reach a resolution, they must prepare a settlement agreement and submit it to the Court.

- B. Any settlement must be:
 - 1. Written;
 - 2. Signed by all parties;
 - 3. Presented to the Court for approval; and
 - 4. Filed with the Department of Court Records.

- C. Orders to Settle and Discontinue must include the following language:
 - 1. The reason why the matter is being discontinued.
 - 2. The matter is DISCONTINUED WITHOUT PREJUDICE.
 - 3. No further proceedings shall be scheduled for this matter.
 - 4. Any holds for conciliation shall be removed by the Department of Court Records.
 - 5. This is a FINAL Order. Rule 236 Notice to be sent to all parties.

- E. **Settlement Agreements and Orders to Settle and Discontinue shall be emailed to henry-taylorchambers@alleghecourts.us.**

PART 16. SPECIAL IMMIGRANT JUVENILE (SIJ) PROCEDURES

SIJ matters require attention to legal standards under both state and federal law. The Court's role is limited to making factual findings necessary under 8 U.S.C. § 1101(a)(27)(J). The Court does not adjudicate immigration status or federal eligibility.

I. NATURE AND PURPOSE OF SIJ PROCEEDINGS

- A. Judge Henry-Taylor will only hear SIJ matters that arise from a custody matter. Judge Bush will continue to hear all SIJ matters arising from dependency matters.
- B. All NEW SIJ requests will continue to go to Judge Bush first. Her Standard Operating Procedures should be followed for submitting a new request.
- C. The Preliminary Order that is sent by Judge Bush's staff will state if the matter will be scheduled and heard by Judge Henry-Taylor. If the Order does not state that it will be heard by Judge Henry-Taylor, then all questions concerning procedure should be sent to Judge Bush's chambers.
- D. Counsel/parties should follow Judge Bush's Standard Operating Procedures with regards to submitting Emergency Confirmation of Custody Motions involving youth that will require a SIJ Status hearing.
- E. The docket suffix may begin as -001, but will be changed to -011 if the case is being handled by Judge Henry-Taylor. If your case is assigned to Judge Henry-Taylor, please check the suffix and update pleadings accordingly.
 1. **Any cases that still contain the -007 suffix shall reflect the correct suffix of -011.**
- F. In Special Immigrant Juvenile (SIJ) proceedings, the Court conducts a focused statutory analysis pursuant to Pennsylvania law for the purpose of making the predicate findings required under federal immigration law. In SIJ Proceedings, the Court determines:
 1. Whether the minor is dependent or placed under custody;
 2. Whether reunification with one or both parents is not viable due to abuse, neglect, abandonment, or similar basis under Pennsylvania law; and
 3. Whether it is not in the minor's best interest to return to their country of nationality or last habitual residence.

The Court applies a holistic analysis grounded in Pennsylvania statutory and case law. **Counsel are expected to tailor their presentation and pleadings to the specific SIJ findings requested and avoid presenting the matter as a full custody modification or best-interest custody trial unless such issues are properly before the Court.**

II. FILING REQUIREMENTS

- A. All Petitions for SIJ Findings must:
 - 1. Identify clearly that SIJ findings are sought;
 - 2. Include factual allegations supporting dependency or custody;
 - 3. Allegations of abandonment, abuse, and/or neglect;
 - 4. Attach relevant supporting documentation; and
 - 5. Be verified by the Petitioner.

III. SERVICE OF PROCESS

- A. Service must comply with the Rules of Civil Procedure.
- B. Alternative service requires a motion supported by an Affidavit of Due Diligence. If, after reasonable efforts, counsel cannot locate the opposing party(ies), counsel shall submit and file an Affidavit of Due Diligence explaining their efforts to locate and effectuate service on the opposing party(ies).
- C. Counsel shall provide the opposing party the Teams/Zoom Link created by the Court.
 - 1. The link must be sent via a letter and filed with other exhibits.
 - 2. Counsel may also send the link electronically through email, direct message, and/or WhatsApp.

IV. TRAUMA-INFORMED PRACTICES

- A. Because SIJ cases often involve vulnerable minors, the Court may:
 - 1. Limit repetitive questioning;
 - 2. Adjust courtroom practices; and/or
 - 3. Allow alternative means of presenting sensitive information.

V. EVIDENCE REQUIRED

- A. Evidence may include:
 - 1. Testimony of the minor;
 - 2. Records from schools, medical providers, or social services;
 - 3. Expert testimony;
 - 4. Affidavits; and/or

5. Evidence of country conditions.

VI. HEARINGS

- A. The Court will schedule SIJ hearings as promptly as possible based on the Court's docket.
- B. Remote testimony may be allowed with prior approval, or ordered by the Court.

VII. ORDERS AND FINDINGS

- A. SIJ orders must:
 - 1. Contain specific factual findings;
 - 2. Reflect the evidence; and
 - 3. Be submitted in Word format for editing.
- B. The Court will not sign boilerplate or conclusory SIJ orders.

VIII. CONFIDENTIALITY

- A. All filings and proceedings must comply with the Case Records Public Access Policy and confidentiality requirements for minors.
- B. The Court will seal orders when appropriate.

IX. POST-HEARING PROCEDURES

- A. **See Part 12 – Post-Trial Motions and Appeals.**
- B. Counsel is responsible for all federal filings.

X. SANCTIONS

- A. Misuse of SIJ proceedings may result in sanctions.

PART 17. TECHNOLOGY AND ELECTRONIC MATERIALS

I. USE OF COURTROOM TECHNOLOGY

- A. Parties must notify chambers three (3) business days in advance if they intend to use:
 - 1. Screens;

2. Projectors;
3. Audio/video playback; and/or
4. Demonstratives.

B. All equipment must be tested in advance.

II. ELECTRONIC EXHIBITS

A. **See Part 11 – Exhibits.**

III. SCREEN SHARING

A. Screen sharing is permitted only with court approval.

B. Documents must have been exchanged previously with opposing counsel.

IV. ELECTRONIC SIGNATURES AND FILING

A. Electronic signatures are acceptable where permitted.

B. All documents must be filed with the Department of Court Records.

V. CYBERSECURITY AND CONFIDENTIALITY

A. Counsel must protect all links, exhibits, confidential information, and minors' information.

VI. TECHNOLOGY FAILURES

A. Participants must notify chambers immediately of any technology issues.

VII. MISCELLANEOUS TECHNICAL TIPS

A. How to Scan a Document on an iPhone

1. Open Notes and select a note or create a new one.
2. Tap the Camera button, then tap Scan Documents.
3. Place your document in view of the camera.
4. 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.
5. Tap Save or add additional scans to the document.

B. Mobile Device Message Extraction Tools

1. To ensure the efficient presentation, preservation, and management of digital communications introduced as evidence, the following tools are approved for use in courtroom proceedings involving mobile devices:
2. iMazing (for iPhone/iOS Devices)
 - i. Purpose: Manage and extract messages from iPhone, iPad, and iPod devices
 - ii. Capabilities:
 1. Archive, export, and print iMessages, SMS, and WhatsApp conversations.
 2. Retain complete metadata for legal or compliance verification.
 3. Exported data includes attachments and media files.
 4. Output formats are suitable for evidentiary presentation and recordkeeping.
 - iii. Website: <https://imazing.com>
3. Dr. Fone (for Android Devices)
 - i. Purpose: Manage and extract messages from Android devices
 - ii. Capabilities
 1. Export text messages (SMS) to TXT, HTML, or Excel formats.
 2. Backup and restore media files (music, photos, videos), contacts, and applications.
 3. Generate readable formats suitable for submission into the evidentiary record.
 - iii. Website: <https://drfone.wondershare.com>