

Standard Operating Procedures

for

Honorable Jaime M. Hickton

Criminal Division

Allegheny County Court of Common Pleas

Courthouse Room 316

436 Grant Street

Pittsburgh, PA 15219

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Effective as of September 2026

The following Standard Operating Procedures govern practice before Judge Jaime Hickton in the Criminal Division of the Allegheny County Court of Common Pleas. These procedures supplement and do not replace the Pennsylvania Rules of Criminal Procedure and Local Rules of Court, which counsel and self-represented parties are also required to follow. Questions regarding scheduling or administrative matters should be directed to Chambers. Contact information for all judicial staff is listed below in this document.

GENERAL INFORMATION

- **Appearances:** Unless otherwise directed by the Court, all counsel and self-represented parties are required to appear in person for all hearings, arguments, conferences, and trials.
- **Conduct:** Every person has the right to be treated with dignity and respect. Attorneys, their staff, witnesses, self-represented defendants and their witnesses, and every person who interacts with the Court and Court Staff or who appears before the Court is expected to treat others with dignity and respect. The Court will not tolerate inappropriate behavior by anyone who disrespects and/or disrupts the proceedings or who otherwise behaves in any manner that demonstrates a failure to comply with this policy. While this is an adversarial system, Courts have broad authority to control the courtroom and conduct proceedings consistent with the applicable rules. Any person who fails to comply with this policy risks including, but not limited to, exclusion from the proceeding(s), sanctions and/or other remedial measures imposed by the Court.
- **Email Communications:** When communicating with the Court by email, ALL counsel and self-represented parties must be included on the communication. Do not BCC any party, client, or opposing counsel. Email communications to Chambers shall be limited to transmitting filed documents and inquiring about administrative and scheduling matters. Communications that constitute ex parte contact — including substantive legal argument not authorized by the Court — will not be considered and will be disclosed to opposing counsel.

- Courtesy Copies: The Court does not automatically receive copies of documents filed via PACFile or with the Clerk of Courts. A courtesy copy of all filed documents must be emailed to Chambers and the opposing party promptly after filing. All documents should be submitted in PDF or Microsoft Word format. Proposed orders must be submitted separately in Microsoft Word format to permit editing by the Court. File-sharing services, Dropbox links, and other external transfer links are not accepted. For voluminous submissions, contact Chambers for instructions.
- Attorney/Party Contact Information: All documents submitted to the Court must include the submitting attorney's or self-represented party's name, phone number, mailing address and email address.
- Compliance with the Pennsylvania Rules of Professional Conduct: All attorneys are expected to comply at all times with the Pennsylvania Rules of Professional Conduct during the course of their representation of their client before the Court. Failure to comply with the Rules could result in, including, but not limited to, the Court scheduling proceedings to address necessary matters and, as required by the Pennsylvania Code of Judicial Conduct, referring necessary matters to the Pennsylvania Disciplinary Board.
- Use of Artificial Intelligence ("AI"): Consistent with the Pennsylvania Supreme Court's Interim Artificial Intelligence Policy, the use of artificial intelligence, including generative artificial intelligence ("AI"), to assist in preparing any motion, brief, petition, or other paper presented to the Court is not prohibited; however, the attorney or self-represented defendant who signs or presents the paper remains fully and personally responsible for its contents. Before filing, the signer shall independently verify, against the original print reporter, official reporter, or established legal-research database, that every legal citation, quotation, and statement of law exists, is accurately stated, remains good law, and supports the proposition for which it is offered, and shall confirm that every factual assertion is supported by the record. No sealed, confidential, or otherwise non-public information shall be entered into any AI tool lacking confidentiality and security protections adequate to the information's sensitivity. Counsel remain bound by the Pennsylvania Rules of Professional Conduct, including Rules 1.1, 1.6, 3.1, 3.3, 5.15.3, and 8.4.

Any exhibit, demonstrative, image, audio, video, or recording that has been generated, synthesized, or materially altered or enhanced by AI must be disclosed as such to the Court and opposing counsel no later than the pretrial submission deadline, together with a description of the AI tool or process used and, where the authenticity or accuracy of the underlying content is contested, the information necessary to permit opposing counsel to evaluate that challenge.

Each submission shall include, immediately above the signature, one of the following certifications: (a) that no portion of the submission was generated by generative AI; or (b) that generative AI was used and every citation, quotation, and statement of law has been verified by a human being against the original source and every factual assertion is supported by the record. A single standing certification may be accepted for all filings in a case at the Court's discretion. A submission containing fabricated or materially misrepresented authority, or filed without the required certification, may result in an order

to show cause, striking of the submission, denial of relief, referral to the Disciplinary Board, an opportunity to cure, or any other sanction available under the Court's inherent authority.

CONTACT INFORMATION

Counsel and parties may contact Chambers through the following courtroom staff:

Elida Jones
Judicial Secretary
(412) 350-6330
ejones@alleghenycourts.us

Jeffrey Ries, Esq.
Law Clerk
jries@alleghenycourts.us

Jessica Dolney
Tipstaff
jdolney@alleghenycourts.us

Caitlin Hay
Minute Clerk
chay@alleghenycourts.us

PRETRIAL CONFERENCES

Unless the Court orders otherwise, pretrial conferences will be conducted in person.

1. Attendance: Counsel and Defendants must attend the pretrial conference. Counsel must have full authority to discuss and agree upon scheduling, evidentiary, and procedural matters.
2. Preparation: Counsel must be prepared to address the following at the pretrial conference:
 - The status of plea negotiations or other potential resolutions;
 - Any legal or evidentiary issues requiring the Court's attention before trial;
 - The anticipated length of trial and number of witnesses;
 - Any requests for special courtroom accommodations or technology;
 - Stipulations the parties have reached or intend to reach;
 - Any anticipated motions in limine; and
 - The schedule for submission of pretrial materials.

PRETRIAL MOTIONS

1. Filing: All pretrial motions must be filed via PACFile or with the Clerk of Courts, and a courtesy copy must be submitted to Chambers. Motions shall be filed at least 7 days before trial date to allow adequate hearings, briefing, and/or argument.

2. Motions in Limine: Counsel should use motions in limine only for significant evidentiary issues that cannot be resolved by stipulation. A paper copy of any motions in limine and responses thereto shall be delivered to Chambers in addition to the email courtesy copy.
3. Briefing: Unless otherwise ordered by the Court, written responses to pretrial motions shall be filed at least before the trial date.
4. Oral Argument: The Court will schedule argument on contested pretrial motions as the Court's calendar permits. Counsel shall not assume that argument will be scheduled without direction from Chambers.
5. Proposed Orders: Every motion must be accompanied by a proposed order in Microsoft Word format, submitted as a separate attachment to the Chambers email.

DISCOVERY

1. Compliance with Rules: All discovery obligations are governed by the Pennsylvania Rules of Criminal Procedure and applicable case law. Counsel are expected to comply fully and promptly with all discovery obligations without the need for Court intervention.
2. Discovery Disputes: Before filing a discovery motion and as required by the Rules, counsel must make a good faith effort to engage in informal discovery. Any motion related to discovery must include a certification that counsel has engaged in informal discovery or, if counsel has not, why counsel has not complied with the Rules.
3. Supplemental Discovery: Counsel must supplement discovery responses promptly upon obtaining or identifying additional discoverable material. The obligation to supplement continues through the conclusion of trial.
4. Expert Witnesses: If a party intends to call an expert witness, counsel shall provide opposing counsel with the expert's name, qualifications, and the substance of the expected testimony as required by the Pennsylvania Rules of Criminal Procedure and within any schedule set by the Court.
5. Subpoenas and Third-Party Materials: Counsel shall promptly notify Chambers when subpoenas for records or other third-party materials may affect the trial schedule.

JURY TRIALS

Pretrial Submissions

Unless otherwise ordered at the pretrial conference, the following materials shall be submitted to Chambers no later than seven (7) days before the first day of trial:

- Motions in Limine: All motions in limine and written responses thereto, with a paper copy delivered to Chambers.
- Proposed Jury Instructions: Counsel shall provide a copy of their proposed jury instructions to opposing counsel and the Court before jury selection. The Court will utilize Pennsylvania Suggested Standard Criminal Jury Instructions (PaSSCJIs) whenever applicable. The Court will hold a charging conference to resolve outstanding disagreements. Counsel will file their proposed written jury instructions and provide a courtesy copy to the Court no later than before the jury selection.
- Exhibits: Plaintiff/Commonwealth shall identify exhibits with Arabic numerals; Defendant shall use letters. Copies must be provided to opposing counsel and the Court.

- Submission Deadlines: Unless otherwise ordered by the Court, all pretrial submissions for jury trials shall follow the above articulated filing deadlines.

Trial Procedures

1. Objections: Objections shall briefly state the legal basis. Argument on objections shall be conducted at sidebar, outside the presence of the jury. Examination of a witness shall be suspended upon an objection and shall not resume until the Court rules or directs counsel to proceed. This procedure is not intended to limit a party's right to fully state its objection or disagreement with a ruling; it is intended to ensure that such matters are addressed outside the hearing of the jury.
2. Prior Testimony: If prior testimony will be offered at trial, counsel shall attempt to resolve all objections between themselves in advance. Remaining unresolved objections must be identified and submitted to the Court prior to the date the testimony is to be played or read.
3. Trial Motions: Motions for judgment of acquittal and other mid-trial motions may be made orally; however, a written motion is preferred.
4. Jury Verdict: All counsel shall provide courtroom staff with current telephone numbers to enable prompt contact when a verdict is returned.

NON-JURY TRIALS

Pretrial Submissions

Unless otherwise ordered at the pretrial conference, the following materials shall be submitted to Chambers no later than seven (7) days before the first day of trial:

- Motions in Limine: All motions in limine and written responses thereto, with a paper copy delivered to Chambers.
- Exhibits: Plaintiff/Commonwealth shall identify exhibits with Arabic numerals; Defendant shall use letters. Copies must be provided to opposing counsel and the Court.
- Submission Deadlines: Unless otherwise ordered by the Court, all pretrial submissions for non-jury trials shall follow the above articulated filing deadlines.

Trial Procedures

1. Objections: Objections shall briefly state the legal basis. Examination of a witness shall be suspended upon an objection and shall not resume until the Court rules or directs counsel to proceed.
2. Prior Testimony: If prior testimony will be offered at trial, counsel shall attempt to resolve all objections between themselves in advance. Remaining unresolved objections must be identified and submitted to the Court prior to the date the testimony is to be played or read.
3. Trial Motions: Motions for judgment of acquittal and other mid-trial motions may be made orally; however, a written motion is preferred.

POST-TRIAL MOTIONS

- Filing: A copy of any post-trial motion must be served upon the Court in Chambers or submitted electronically to Chambers promptly after filing via PACFile and/or the Clerk of Courts. Said motion shall include a certificate of service for opposing counsel or party.
- Transcript: The post-trial motion must include a copy of the request for trial transcript. The moving party is responsible for ensuring that the court reporter is timely paid for preparation of the transcript.
- Scheduling: In the Court's sole discretion, the Court will contact the parties to schedule argument on post-trial motions following receipt of the transcript.