Rhode Island Bar Journal

Rhode Island Bar Association Volume 60. Number 4. January/February 2012

Modest Proposals for Rhode Island Superior Court Reform

Arbitration and the Unauthorized Practice of Law

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Creative Receivership and Redevelopment

Modest Proposals for Rhode Island Superior Court Reform

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... ten proposals for reforming current practice to augment the commendable efforts being undertaken in the Superior Court.

Under the leadership of Presiding Justice Alice Gibney, the Superior Court has done yeoman's work in moving civil cases through the judicial system. These recent efforts are designed to reduce the backlog of cases and ensure that litigants receive their day in court in a timely manner. As former Chief Justice Warren Burger has observed, "A sense of confidence in the courts is essential to maintain the fabric of ordered liberty for a free people," and one of the main things that could "destroy that confidence and do incalculable damage to society: that people come to believe that inefficiency and delay will drain even a just judgment of its value."[1]

In that spirit, I offer ten proposals for reforming current practice to augment the commendable efforts being undertaken in the Superior Court. Many of these proposals can be implemented immediately. A few require retooling of existing procedures. Each one owes its origin to the federal system, the experience of other state court systems or recent developments in our own court.

1. Mandatory Mediation

Courts are designed to resolve conflict. They can do so in a number of ways, most notably through full-blown litigation or alternative dispute resolution (ADR). The Superior Court's highly successful "Settlement Week" is an excellent example of the latter approach.[2] Mediation is also required in medical malpractice cases. There is no reason why ADR cannot occur early on in every case.

Mediation should be required after a lawsuit has been pending for three months, even if a dispositive motion is pending. The mediation should be scheduled within the succeeding three months and require the presence of the parties. The parties can draw on the mediation services available in the court system or retain a private mediator if they so choose. With the Rhode Island Bar Association's cooperation, mediators who will need to be recruited should be given Continuing Legal Education credit for each case mediated.

The benefits of mediation are legion. In broadest terms, mediation is less expensive and more expeditious than litigation and eliminates the need for appeals. Parties tend to be more satisfied with outcomes upon which they have mutually agreed than those imposed upon them by a judicial decision-maker such as a judge or jury. The process also allows for the parties to have more control over the outcome and to craft their own customized agreements to cover the spectrum of disputed issues. In this way, the parties can feel they have a greater voice in the final result and this, in turn, enhances the prospect of future compliance with the terms of the settlement.

2. Scheduling Orders Governing Discovery

Cases filed in Superior Court, with certain exceptions, do not have scheduling orders governing discovery.[3] When a lawsuit is filed, there are no deadlines for disclosure of experts, the closure of discovery or even the filing of summary judgment motions. As a result, parties are free to conduct discovery right up to the eve of trial. Indeed, because there is no obligation for plaintiffs to disclose experts by any particular deadline, many defendants hold back until they see the plaintiffs' expert case, thereby creating delay in a system that is ripe for foot-dragging.

At the outset of the case, a scheduling order should issue establishing deadlines for disclosure of plaintiffs' expert witnesses, if any, and then the defendants' experts, the close of discovery, and the filing of summary judgment motions. Each scheduling order should establish an eighteen-month deadline for discovery to end, subject to modification by the court upon the parties' request. Expert deadlines can be set beginning at the one-year mark. Summary judgment motions, while they may be filed at any time, should be required no later than thirty days after discovery has concluded. Except in large or complex cases, a lawsuit that lingers longer than two years is a drag on the system and the litigants.

Scheduling orders now an integral part of medical malpractice cases, have been routinely used in the federal courts with excellent results and should provide significant benefits by focusing the parties and their attorneys on the

task at hand. The deadlines should encourage the participants to work expeditiously toward resolution of the case. Staggered expert disclosures will ensure fairness in the process by giving plaintiff's counsel adequate time to prepare their respective experts and providing defense counsel sufficient notice of the plaintiffs' expert theories to prepare an appropriate response. The discovery closure will allow the parties to prepare for trial, if necessary, without the worrisome prospect that more discovery will be sought by the opposing side as trial nears.

3. Mandatory Meetings On The Status Of Medical Records In Personal Injury Cases

In personal injury cases, significant delays can result from the collection of the plaintiff's medical records and in seeking to resolve disputes over the scope of relevant documents. Often, the plaintiff's counsel prefers to control the gathering of such records and to limit their time-frame. Defense counsel, by contrast, seeks to expand the scope of relevancy by including the records in years before the injuries and to gather the documents through subpoena or medical release. Absent cooperation among the parties' counsel, many months are often expended while the plaintiff's counsel collects the records, opposing counsel spar over the scope of the requests, and the court grapples with the inevitable fallout when good-faith efforts at compromise fail to succeed.

Counsel for the parties in any case involving personal injuries should be required to meet and confer within ninety days of the filing of the lawsuit to discuss the scope of the medical records requests and the mechanism and timeline for achieving those records. If there is agreement, an appropriate subpoena can be crafted to ensure that health care providers timely produce all the relevant information. After the meeting, if any disputes remain, the parties should be required to raise them before the court within thirty days so that a prompt determination can be achieved. If receipt of medical records reveals the need for further discovery, neither party would be precluded from raising additional issues at a later date. These requirements should be made part of the standard scheduling order issued when the lawsuit is filed.

The foregoing meet-and-confer requirement should reduce the delay that often results in personal injury cases from the collection of medical records. While many plaintiffs' counsel appreciate that medical records are a priority, this certainly should become the norm in all cases. By the same token, counsel for both parties will have assurances that there is a mechanism in place for prompt resolution of medical-records issues. The result should be a win-win for both sides and lead to greater focus on the merits of the case.

4. Status Conferences With The Court After One Year

After a lawsuit has been filed, with the exception of medical malpractice cases, there normally is little or no judicial supervision, absent motion practice, prior to a control calendar call. By that time, however, the case could have been pending in the court system for many years. In fact, if the parties' attorneys take few steps to move the case forward, it can languish in the system far too long.

A status conference with a judicial officer should be required at the first-year anniversary in every case. The purpose of the conference would be to discuss

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the progress of discovery, any problems encountered or anticipated in the litigation, and the likelihood of dispositive motions when discovery has closed. The prospects for resolving the case through settlement, ADR or trial should be addressed as well.

In the long run, meaningful judicial supervision will ensure that cases receive the attention they deserve and that the parties and their counsel appreciate their particular role in moving them toward a timely conclusion. These status conferences should motivate sluggish counsel facing the one-year anniversary to step up their efforts. Few attorneys will want to approach the judicial officer at the status conference with a blank to-do list.

5. Automatic Assignment To The Trial Calendar After Two Years

Currently, cases are not placed on the trial calendar unless one of the parties files a motion. In Providence County, for instance, the moving party must certify that discovery in the matter is "substantially complete," which means there is no outstanding discovery that will delay the trial when the matter is reached.[4] An opposing party can object to the assignment, arguing that the standard has not been met. Absent a motion, however, cases can remain in limbo, despite the length of time they have been pending.

If the proposals above are implemented, most cases should be ready for trial in two years, though larger or more complex cases, usually with multiple parties, will need more time. In the vast majority of cases though, discovery will be completed within two years and cases should receive automatic assignment to the continuous jury or non-jury trial calendar. This should be the rule rather than the exception.

Automatic assignment has the virtue of driving cases toward trial or perhaps even settlement. At the same time, the parties' counsel will recognize that they must complete discovery lest they proceed, unprepared, at trial. To the extent that automatic assignment poses problems for parties or attorneys in a given case, the court retains the authority to grant an appropriate extension and relieve one side or the other of the hardship.

6. Abolition of Conditional Orders Of Dismissal

A major aspect of court practice that

undermines the prospect of prompt resolution of cases is the conditional order of dismissal. A conditional order of dismissal is entered *after* the requesting party has successfully moved to compel discovery and *after* the responding party has failed to comply with a court order requiring discovery to be answered within a specified period of time. By that time, normally, several months have elapsed since the discovery was first propounded without response. The availability of a conditional order of dismissal only encourages parties to delay responding to discovery when initially received or, in some cases, complying with an order compelling discovery. This extra step is neither necessary nor required by the civil rules. In fact, Rule 37(a) of the Superior Court Rules of Civil Procedure allows for the original order compelling discovery to expressly provide for entry of final judgment dismissing a claim or action if there is a lack of compliance within thirty days.[5]

Conditional orders of dismissal should be abandoned. If a party fails to respond to discovery in a timely manner, an order should be entered requiring compliance in thirty days and court-ordered sanctions, at a later hearing, upon non-compliance.[6] The order should not be an invitation to another step in the process – a conditional order of dismissal – and another bite at the apple.

Although cases should be decided on the merits, court orders must have teeth. If an order to compel will only lead to a conditional order of dismissal without further consequences, then there is little or no incentive to comply with the original order. Instead, a party can merely wait for the conditional order and comply at that time. Vigorous enforcement of the parties' discovery obligations and initial discovery orders will have a salutary effect on reducing or eliminating tardiness.[7]

7. Expert Reports

Rule 26(b)(4)(A) of the Superior Court Rules of Civil Procedure allows a party to propound an interrogatory requiring the opposing party to identify its expert witness at trial, "to state the subject matter on which the expert is expected to testify, and to state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion." However, the

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rules do not require experts to provide reports detailing their opinions and conclusions. As the notes to 1993 amendments to the Federal Rules observed, "The information disclosed under the former rule in answering interrogatories about the 'substance' of expert testimony was frequently so sketchy and vague that it rarely dispensed with the need to depose the expert and often was even of little help in preparing for a deposition of the witness."

Consistent with current practice in federal court, Rule 26 should be amended to require parties to submit a comprehensive report for each expert witness testifying at trial. The report should contain: 1) a complete statement of all opinions the expert will express and the basis and reasons for them; 2) the facts or data considered in forming those opinions; 3) all exhibits that will be used to summarize or support the opinions; 4) the witness's qualifications, including a list of all publications authored in the previous ten years; 5) a list of all other cases in which, during the previous four years, the witness testified as an expert at trial or deposition; and 6) a statement of the compensation to be paid for the study and testimony in the case. The expert should sign the report under penalty of perjury as is the case with interrogatory answers.

Expert reports serve several purposes. They enable opposing parties to understand the expert's opinions and their factual grounding so that proper rebuttal can be prepared. From an efficiency standpoint, comprehensive expert reports should reduce the length of expert depositions and, in some cases, eliminate their need altogether. In fact, such expert reports might even convince one party or other of the virtues of settlement.

8. Pretrial Orders And Final Pretrial Conference.

Recently, in Providence County, pursuant to administrative order, cases that have been assigned to the trial calendar, other than business calendar and medical malpractice cases, proceed to a pretrial conference to address a variety of pre-trial issues including dispositive motions, trial witnesses and exhibits, potential trial issues, ADR and other special or unique

issues particular to the parties or the case.[8] The conference is conducted pursuant to Rule 16 of the Superior Court Rules of Civil Procedure and Rule of Procedure 2.4.

The Superior Court's administrative order is a welcome improvement that is sure to facilitate preparation of cases for trial and thus expedite their resolution. The administrative order should address the filing of motions *in limine* prior to trial and the scheduling of a final pretrial conference before the actual trial judge who will hear the case. Further, counties beyond Providence should be included within the administrative order's ambit. The goal is for the parties to be prepared for trial and, equally as important, for the court to have sufficient time to consider any pretrial motions.

Moreover, there should be a standard pretrial order governing the disclosure of trial witnesses, the pre-marking of exhibits, the disclosure and use of demonstrative exhibits and the filing of proposed jury instructions. The order should require counsel to meet and confer to resolve as many evidentiary objections as possible and establish deadlines for exchanging and cross-designating deposition testimony for use at trial. The use of courtroom technology or other innovative techniques should be explored as well.

9. Phasing Out The Motion Calendar

Despite the best efforts of the motion judges to move through the daily calendar, the sheer volume, particularly of non-dispositive motions, makes expeditious resolution a daunting task. The result is that most non-dispositive motions are not well briefed or even read before the court takes the bench, and attorneys are required to wait, sometimes hours, before a contested motion is heard. On dispositive motion days, the court is frequently faced with multiple motions of significance without the benefit of the considerable study time that one normally finds in the federal court system. In both instances, the court may be facing the matter for the first and only time with little more of the case background and history than what might be provided orally or in briefing.

The motion calendar should be phased out. The Superior Court should move toward the federal court model by assigning each case to a single judge from the outset until discovery closes and disposi-

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tive motions are resolved. This would allow judges to keep track of their own case loads and schedule motions in light of the time and attention necessary for each particular one.[9] Equally important, the court itself can track the progress of each judge's supervision of the cases so that they move through the system at the appropriate pace.

Arguably, phasing out the motion calendar, given its lengthy history, is not a modest proposal for reform. However, the court's business calendar is a model for this form of change. The success of that calendar suggests that a modified federal court approach would be equally successful for all cases.

10. Reduction Of The 12% Pre-Judgment Interest Rate.

Rhode Island law provides for 12% prejudgment interest which runs from the date the cause of action accrues. R.I. Gen. Laws § 9-21-10. Compared to interest rates available elsewhere such as the U.S. Treasury rate, Rhode Island's rate is exorbitant. Worse, the rate rewards plaintiffs for delaying cases and punishes defendants, even those who legitimately want to move them forward.[10] While it is true that the rate may prompt defendants to expedite cases, plaintiffs are often in the driver's seat, inasmuch as they normally dictate when, for instance, they will depose the opposing party or disclose their experts. Thus, a defendant may be held financially liable for delay that it did not cause. Indeed, it can be argued that the extremely high prejudgment interest rate is an impediment to settlement in many cases.

Rhode Island's prejudgment interest statute should be amended. This will require the General Assembly to take action because the court lacks the power to effect this particular change. Nonetheless, the court can use its considerable influence to recommend change as it has done in other areas of the law when warranted.

While any rate reduction may be considered an arbitrary exercise, the rate should effectuate two primary goals – encourage early settlement of cases and compensate the injured for the loss of use of money. There are a variety of approaches that the General Assembly might use to achieve these goals such as a Treasury bill rate plus a certain percentage, say 3%. However, in light of the long-standing use of a single figure, a 6% interest rate would appear to be reasonable and appropriately promote the necessary goals without providing a perverse incentive to delay the resolution of cases.

ENDNOTES

1 *Warren Burger, What's Wrong With the Courts: The Chief Justice Speaks Out, U.S. News & World Report (Vol. 69, No. 8, Aug. 24, 1970) 68, 71 (address to ABA meeting, Aug. 10, 1970).*

2 *Currently, only cases assigned to the trial calendar are eligible for Settlement Week. Settlement Week should be expanded to include those cases that are not necessarily on the trial calendar but that the parties believe are sufficiently far along that there is a significant likelihood of settlement.*

3 *In medical malpractice cases, no later than the first anniversary of the commencement of the action, the parties must file a joint motion for a discovery conference, after which the court will issue an order establishing a schedule for fact discovery and expert disclosure and a deadline for completion of expert depositions. Administrative*

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Order No. 2009-26.
4 *Superior Court Administrative Order No. 2011-07.*
5 *As a further basis to expedite discovery, it is recommended that the time for a party to respond to interrogatories and requests for production be reduced from forty days to thirty, as is the case with requests for admissions and for written discovery in the federal system. This would require a change to the existing rules of civil procedure.*
6 *Sanctions can run the gamut from an award of costs to waiver of objections.*
7 *Since signed orders are a staple of the court system, the court should appoint a single "orders" clerk responsible for receiving proposed orders and ensuring that they are executed by the appropriate judicial officer and are filed in the case file.*
8 *Superior Court Administrative Order No. 2011-07.*
9 *Even if the motion calendar is retained, the court should consider scheduling a morning and afternoon session, perhaps based on even and odd case numbers, so that wait times are reduced.*
10 *Indeed, the high interest rate encourages plaintiffs to postpone filing their lawsuits until right before the statute of limitations expires. As a stark example, a personal injury plaintiff who files suit just prior to the three-year limitations period has accrued 36% prejudgment interest even before the case has commenced. In Massachusetts, by contrast, prejudgment interest in tort cases runs from the date that the lawsuit was filed. In contract cases, interest is calculated from the date of the breach or demand, but if that date is not established then from the commencement of the action.* ❖

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