

# Non-Jury Trial Vehicle Fast Track

The NJVFT is a new scheduling order option intended to expedite basic vehicle cases with minimal personal injury/other damages

# Basics

- Allows—with the consent of all parties—an expedited scheduling track
- All parties must waive a jury demand
- Limits the Plaintiff's Damages Request to \$50,000
- Discovery:
  - Limited in scope - permits Interrogatories and Requests for Production of Documents only (no depositions, no IMEs, no requests for admission)
  - Expedited – discovery responses are due within 20 days and discovery closes within 40 days of issuing the NJVFT Scheduling Order
- No mandatory mediation – parties may request to have a mediation scheduled through Chambers or Multi-Door

# Basics, cont.

- Pretrial proceedings are expedited – no pretrial conference will take place (and no joint pretrial statement is required)
- Trial is expedited – a non-jury trial will be scheduled at the ISC (or in an order issued by praecipe when a Form CA 113 is filed (Notice Requesting Scheduling Order) within 120 days
- Trial is streamlined – all medical bills, medical records, and property damages invoices will be admitted without testimony

# Mechanics

- Plaintiff will serve, along with the summons, complaint, and initial order, a Notice of Intent to Seek the Non-Jury Trial Vehicle Fast Track
- Notice serves to ask Defendants for consent to waive the right to a jury trial in exchange for Plaintiff limiting their request for damages to \$50,000
- Notice also advises that should Defendant(s) decline to waive their jury trial right, Plaintiff will be permitted to increase their damages request



**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C.**  
**20001 Telephone: (202) 879-1133 Website: [www.dccourts.gov](http://www.dccourts.gov)**

**NOTICE OF INTENT TO SEEK NON-JURY VEHICLE FAST TRACK**

By filing this complaint with a request for damages not to exceed \$50,000.00 and without a jury demanded, Plaintiff(s) provides notice of their intent to seek the Non-Jury Vehicle Fast Track (NVFT) scheduling order for this litigation.<sup>1</sup> The NVFT requires that all parties to the litigation waive their right to a jury trial, and that damages cannot exceed \$50,000.00.

The NVFT includes the following litigation parameters:

- All parties are to confirm both their waiver of a jury demand and their consent to proceed on the NVFT either at the Initial Scheduling Conference or by praecipe submitted in accordance with Super. Ct. Civ. R. 16(b)(2).
- Discovery is limited to interrogatories pursuant to Super. Ct. Civ. R. 33 and requests for production of documents pursuant to Super. Ct. Civ. R. 34 ONLY.
- Interrogatories and requests for production of documents are to be served no later than 20 days after the issuance of a NVFT Scheduling Order.
- Responses to discovery requests on the NVFT are due 20 days after receipt of the requests.
- Discovery will close within 40 days of the issuance of the NVFT Scheduling Order.
- A non-jury trial will be scheduled at the Initial Scheduling Conference for a date no later than 120 days after the Initial Scheduling Conference. No Pretrial Conference will be scheduled.
- All medical bills, medical records, and property damage invoices will be admitted at trial without testimony and must be exchanged no later than 60 days prior to the trial date.
- The NVFT does not include a mandatory mediation requirement; parties may jointly request the scheduling of a mediation with the Multi-Door Dispute Resolution Center.

---

<sup>1</sup> If a Defendant chooses not to waive their right to a jury trial, Plaintiff(s) may amend their Complaint to increase the *ad damnum* clause.

Form CA 113. Notice Requesting Scheduling Order.



Superior Court of the District of Columbia  
CIVIL DIVISION  
Civil Actions Branch  
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001  
Telephone: (202) 879-1133 Website: [www.dccourts.gov](http://www.dccourts.gov)

Plaintiff .....

Case No.:.....

v.

Calendar No.: .....

Defendant .....

Judge: .....

Scheduling Conf. Date: .....

NOTICE REQUESTING SCHEDULING ORDER

Counsel for all parties, as evidenced by their signatures below, hereby certify that:

1. This lawsuit is at issue (all parties have been served and have answered); and
2. All parties are represented by counsel; and
3. There are no pending motions; and
4. All counsel has discussed the provisions of Rule 16(b)(4)(B) and (C) and do not foresee any issue requiring court intervention; and
5. This request is being filed no later than 7 calendar days prior to the Scheduling Conference set herein; and
6. Pick Option 5a or 5b.

**5a MOTOR VEHICLE CASES ONLY:**

Counsel request that the Court issue a Scheduling Order for:

- \_\_\_\_\_ Mediation Track V1  
\_\_\_\_\_ Mediation Track V1 fast  
\_\_\_\_\_ Mediation Track V2  
\_\_\_\_\_ Mediation Track V2 fast  
\_\_\_\_\_ Non-Jury Trial Track fast

Counsel and parties are available on the following proposed dates after the close of discovery for Mediation and Pretrial. The Mediation and Pretrial dates shall be approximately 30 days apart. You will be notified if the proposed dates are not available for the Court.

1. \_\_\_\_\_ Mediation \_\_\_\_\_ Pretrial
2. \_\_\_\_\_ Mediation \_\_\_\_\_ Pretrial

**5b ALL OTHER CASES:**

Counsel request that the Court issue a Scheduling Order for:

\_\_\_\_\_ Mediation \_\_\_\_ Track I or \_\_\_\_\_ Mediation \_\_\_\_ Track II.

***Please sign below:***

Date: \_\_\_\_\_ Counsel for Plaintiff(s) \_\_\_\_\_



SUBMIT COMMENTS



AMENDMENTS TO  
GENERAL ORDER



AMENDMENTS TO CIVIL  
RULES (AS NEEDED)

# Limited-Scope Mediation Program

The Limited-scope mediation program will mediate contested Motions to Compel.



# Judicial Referral

- For mediation of substantive opposed discovery motions (Motions to Compel)
- Civil II judges will refer relevant matters to Multidoor for mediation
- At the time of referral, Civil II judges will set a status hearing by which parties will report back

# Program Mechanics

- Multidoor is identifying several volunteer mediators (practicing or retired lawyers) who will mediate the motions
- Once matter is certified, Multidoor will assign a volunteer mediator who will contact the parties to assist them in resolving the discovery dispute
- Once resolved, volunteer mediator will draft a proposed order outlining the resolution and forward it the referring judge prior to the status date
- If not able to resolve, the volunteer mediator will inform the referring judge, and the parties will appear for the status hearing