

JUDGE LYNNE T. INGRAM
Eighth Circuit Court Davidson County, Tennessee
Room 604

I. Brief Biography

Lynne Tyler Ingram is judge of the Eighth Circuit Court for the 20th Judicial District serving Davidson County, Tennessee. She was elected to the bench in 2022.

Judge Ingram is a 2000 graduate of the University of South Carolina, where she earned her Bachelor of Arts in English and was Captain of her nationally-ranked mock trial team. In 2003, Judge Ingram earned her law degree from Western Michigan Cooley Law School, where she was recognized as an Outstanding Senior Litigator.

Judge Ingram comes from a family of public servants and has dedicated over 14 years of her career to public service and a non-profit organization. She began her law career as a county prosecutor in Phoenix, Arizona, and spent almost a decade as a federal prosecutor in the Middle District of Tennessee. She has also practiced as a commercial litigator in private practice and as the Lead Family Law Attorney at Legal Aid Society of Middle Tennessee and the Cumberlands. Judge Ingram is an Adjunct Professor at Vanderbilt Law School.

Before being elected to the bench, Judge Ingram was recognized as a Nashville Business Journal Woman of Influence in 2021. She received the Federal Bureau of Investigation Director's Recognition of Outstanding Prosecutive Skills in Human Trafficking in 2018. Judge Ingram received the Larry Dean Wilks Leadership Award from the Tennessee Bar Association Leadership Law Class of 2014. She is a Fellow of the Nashville Bar Foundation and has mentored for the Nashville Bar Foundation Leadership Forum since 2017.

II. Preliminary General Matters

A. Contact Information

Judicial Assistant: Jessica Page
(615) 880-2591
JessicaHPage@jnsnashville.gov

Law Clerk: Jennifer Cardoza
(615) 880-2591
JenniferECardoza@jnsnashville.gov

Senior Staff Attorney: Emily Sanders
(615) 880-2592
EmilyASanders@jnsnashville.gov

B. Familiarity with Local Standards

Judge Ingram expects all attorneys who appear before her to be familiar with, and to abide by, all Local Rules, standing orders, these Chamber Rules, and local standards of practice and civility.

C. Telephone Conferences

Telephone conferences are permissible whenever the physical presence of out-of-town counsel or in-town counsel is not feasible or necessary. Judge Ingram generally will not resolve discovery disputes by telephone. Attorneys or parties must file the appropriate motion and set for hearing. Judge Ingram may conduct emergency motions by telephone whenever it is necessary or appropriate. If a conference call is necessary, please contact the Staff Attorney to Judge Ingram.

D. Pro Hac Vice Admission

The Court follows Tennessee Supreme Court Rule 19 if a lawyer not licensed to practice law in Tennessee wishes to appear or participate in a proceeding before the Court pro hac vice.

E. Recordings of Hearings

Pursuant to Davidson County Local Rule 8, the Eighth Circuit Court does not allow attorneys or parties access to audio or video transcripts from court hearings. The Tennessee Supreme Court has held such recordings are considered a work product of the Court and are not required to be disclosed. *State ex rel. Wilson v. Gentry*, No. M201902201COAR3CV, 2020 WL 5240388 at *1, *4 (Tenn. Ct. App. Sept. 2, 2020). Parties are welcome to have a court reporter present at hearings.

III. Pretrial Matters

A. Scheduling

i. Case Management Conferences

In jury cases, Special Master Nichols will schedule a Case Management Conference typically within 4–6 months from the date the case was initially filed.

- a. Scheduling Orders:** A Scheduling Order will be entered at the Case Management Conference. All modifications to original Scheduling Orders must be reviewed by Special Master Nichols and approved by order of the Court even if agreed to by the parties.
- b. Motion Books:** Please adhere to the timeline set forth during the Case Management Conference regarding Motion Books and ensure that the Court receives the physical Motion Book for the case by the specified deadline.

ii. Pretrial Conferences and Hearings

Pretrial conferences, pretrial hearings, and other specially-set hearings must be scheduled directly with the Eighth Circuit Staff Attorney Emily Sanders. Please call

(615) 880-2592 to find an acceptable date. (Note: In jury cases, parties will work with Special Master Nichols and the Eighth Circuit Court Staff Attorney when scheduling a pretrial conference.)

Once a party has selected a date from those offered, the party shall notify the Court to confirm the Court's availability. After the date has been confirmed by the Court, the requesting party shall file a Notice Setting (or Resetting) Hearing using the Davidson County E-Filing System. The Court will then specially set the hearing on the Court's calendar.

B. Continuances

i. Scheduling Orders

Extensions of Scheduling Order deadlines are generally considered if requested before the deadline has passed and there is no unfair prejudice to the opposing party.

ii. Motions

Matters set to be heard on a Friday Motion Docket or at a specially set hearing will be granted a continuance at the Court's discretion and upon a showing of good cause. The party shall E-file a Notice Resetting Hearing reflecting the new hearing date upon confirmation from the Court. The Court encourages open communication in these circumstances.

To be reset on a Motion Docket more than two weeks in advance, a party shall E-file a Notice Resetting Hearing.

To be reset on a Motion Docket which is set to be heard in less than two weeks' time, Court permission is required. Upon the Court granting permission allowing the motion to be reset, the party shall E-file a Notice Resetting Hearing. The movant must also provide timely notice of the continuance to all parties.

iii. Trials

Trial continuances are granted only upon a showing of just cause supported by affidavit and supporting documentation. Parties may not agree to continue a trial without the Court's permission.

C. Discovery

i. Discovery Period

Judge Ingram expects the parties to adhere to the Case Management Order and Scheduling Order deadlines. Any extensions must be by Court Order. Agreement by counsel is insufficient.

ii. Discovery Disputes

Judge Ingram expects that parties will attempt to resolve discovery disputes between themselves. Disrespectful behavior will not be tolerated. Discovery disputes require the filing of a motion pursuant to Local Rule § 22.08.

iii. Expert Witnesses

Counsel shall not contact expert witnesses engaged by opposing counsel or parties without permission and approval by the Court.

iv. Settlement

The Court encourages settlement of cases, particularly with the use of mediation or ADR. The Scheduling Order shall include mediation or ADR, and parties are expected to make a good faith attempt at settlement.

IV. Motions

A. Motion Dockets

i. Calendar

Pursuant to Local Rule § 26.02, the Motion Docket is heard on Fridays at 9:00 a.m. Attorneys may confirm motion dates via the Circuit Court Clerk's website at <https://circuitclerk.nashville.gov/dockets/> or by contacting the Eighth Circuit Court.

ii. Notice

The Eighth Circuit adheres to the Local Rule § 26.03 which requires a minimum of fourteen days' notice before the scheduled motion hearing date. This Rule also states that a motion for summary judgment cannot be heard until at least thirty-seven days after it is filed unless the parties otherwise agree.

The Court may allow a motion to be heard earlier than required by Local Rule § 26.03 if all parties agree and if Court permission is granted. Please contact the Eighth Circuit Court Staff Attorney to request a date outside of Local Rule § 26.03.

iii. Late Filings

Pursuant to Local Rule § 26.04(e), all responses to motions, "including counter-affidavits, depositions, . . . and briefs, or any other matters presented in opposition" must be E-filed with the Clerk's Office by 11:59 p.m. CST on Monday before the Friday the motion is set to be heard. Responses must be served on all parties by such time.

Pursuant to Local Rule § 26.04(f), replies to motions must be filed with the Clerk's Office by 11:59 p.m. CST on the Wednesday before the Friday the Motion is set to be heard. Replies must be served on all parties by such time.

The Court will not consider late filings.

iv. Appearance Required

The Court requires appearances on all motions with responses absent Court permission. Additionally, the Court requires in-person appearance for dispositive motions with no response. If any party does not appear as scheduled, the Court may choose to strike, adjudicate, or reset the motion to be heard on a later date.

v. Appearance Not Required

Other than dispositive motions, the Court does not require appearances on motions with no response.

vi. Late Appearance

Any party or counsel who will be late for a motion hearing shall notify Eighth Circuit Staff Attorney Emily Sanders, via email at EmilyASanders@jnsnashville.gov, in advance of the first call of the Motion Docket. If the movant fails to appear and the Court strikes the motion, the Court may tax, as costs, reasonable fees and expenses in favor of the opposing party who did appear at the scheduled motion hearing. Local Rule § 26.08.

B. Striking a Docketed Motion

A party may choose to strike his or her motion set to be heard. The party shall E-file a Notice Striking the motion. Please note the Court does not receive notification of Notices to Strike filed within the time limits of Local Rule § 26.04(e). Therefore, a party wishing to strike his or her motion shall notify opposing counsel and the Eighth Circuit Court Staff Attorney Emily Sanders via telephone or email at (615) 880-2592 or EmilyASanders@jnsnashville.gov.

C. Waiving Oral Argument

Parties may also agree to waive oral argument of a motion pursuant to Local Rule § 25.04. The Court will entertain the filing of an agreed order in lieu of appearance on a motion docket hearing.

D. Motion for Expedited Hearing

To schedule a motion on an expedited basis without the agreement of all parties, a party must E-file a Motion for an Expedited Hearing and attach the underlying motion. The party shall also E-file a Proposed Order granting the Motion for Expedited Hearing, leaving the date blank for the Court to complete. The Motion for Expedited Hearing shall fully explain why Local Rule § 26.03(a) or (b) should be waived. If Judge Ingram grants the Motion for Expedited Hearing, she will enter an Order and schedule a hearing on the underlying motion. All parties will be notified of the expedited hearing date by email or telephone.

E. Continuing a Docketed Motion

Please see Section III(B)(ii).

F. Filing of Orders

i. Proposed Orders

A Proposed Order shall be filed by the prevailing party representing the Court's ruling on a motion within seven calendar days of the motion hearing, pursuant to Local Rule § 33.01(a).

ii. Objections

If the opposing party objects to the Proposed Order, the Eighth Circuit Staff Attorney Emily Sanders must be notified by email at EmilyASanders@jnsnashville.gov of the objection within three calendar days of the Proposed Order's submission, and a competing Proposed Order must be submitted for the Court's consideration within seven calendar days of the objection pursuant to Local Rule § 33.02.

Please note, without email notification of such objection, the Court will proceed with its review of the prevailing party's Proposed Order.

iii. Agreed Orders

By presenting an Agreed Order to the Court, the parties are representing that all parties to the matter have agreed to and signed the order. Therefore, all parties must sign the Proposed Agreed Order if the parties wish for the order to be entered as agreed.

iv. Signature Line

Orders should not include a signature line for Judge Ingram's signature. Judge Ingram's signature will appear on a separate page.

v. Court Costs

All final judgments must contain language taxing court costs as designated by the parties involved in the case. The Court will not enter any proposed final judgments or any compromise and settlement orders until such language is added and court costs are assigned.

V. Trial Procedures

A. Motions in Limine

i. Standard

Motions in Limine shall be filed pursuant to Local Rule § 30 and set according to the Case Management Order or Scheduling Order.

ii. Pretrial Conference

The party filing the motion shall refer to the procedure outlined in Section III(A)(ii) of the Eighth Circuit Court's Chamber Rules to schedule a pretrial conference and have the Motion(s) in Limine heard prior to trial. The Court will offer available dates approximately two weeks prior to trial.

Only upon a finding of exceptional circumstances will the Court grant permission to hold a pretrial conference to hear Motions in Limine on the morning of trial. This is to allow appropriate time for efficient jury selection on the first day of trial.

B. Proposed Jury Instructions and Verdict Forms

Proposed jury instructions and the verdict form shall be provided to the Court no later than three business days in advance of trial. Attorneys shall file and email to the Eighth Circuit Staff Attorney joint proposed jury instructions. For requested instructions not agreed to, attorneys shall file and email those to the Eighth Circuit Staff Attorney as a separate document. When submitting proposed jury instructions, attorneys must provide the full text of each proposed instruction that they are requesting in a Word document.

C. Courtroom Decorum

- i. Attorneys shall treat each other with respect. Please do not interrupt opposing counsel in the midst of argument.
- ii. Please stand when speaking at counsel table.
- iii. Please use the podium when addressing the Court to ensure the Court can hear you.
- iv. Please ask permission before approaching Judge Ingram or a witness.
- v. Please wait for the Court Officer to come forward and receive exhibits. The Court Officer will pass exhibits to Judge Ingram and witnesses.

D. Voir Dire

- i. Counsel should be mindful that voir dire is not an opening statement.
- ii. Potential jurors are seated in the jury box with the remaining seated in the gallery.
- iii. Judge Ingram will conduct a short preliminary voir dire of jurors who are initially seated in the jury box as well as those who are subsequently seated in the jury box.
- iv. Please address questions to the jurors seated in the jury box.
- v. After counsel has addressed the first group of jurors in the box, counsel shall address only the newly seated jurors who replace the excused jurors.
- vi. Counsel may use his or her challenges per party against any juror until all challenges are exhausted. Back striking is permitted.

E. Notetaking by Jurors

Notetaking by jurors is encouraged. Pen and paper are provided. Jurors may take their notes into the jury room for deliberation.

F. Opening Statement

Please keep in mind that an opening statement is not the time for argument but rather is for the presentation of anticipated facts. Opening statements shall not exceed a reasonable time based upon the complexity of the case.

G. Exhibits

The use of courtroom technology is encouraged when presenting exhibits. Once entered, the Courtroom Clerk for the Eighth Circuit will label all trial exhibits.

H. Closing Argument

Closing argument shall not exceed a reasonable time based upon the length and complexity of the case.

I. Side Bar Conferences

Judge Ingram will hold side bar conferences to avoid having the jury leave the courtroom unless it is a complicated matter that will take considerable time.

J. Jury Deliberation

- i. Jury deliberations are conducted in the Jury Room.
- ii. A copy of the jury instructions and verdict form are provided to the jurors. The jury is immediately given all exhibits admitted into evidence.
- iii. Jurors do not have access to depositions during deliberations.
- iv. Counsel do not need to remain in the courthouse during jury deliberations but must let the Court know how they can be contacted and remain reasonably close.
- v. Jury questions shall be submitted to Judge Ingram. Judge Ingram will communicate with counsel prior to responding to jurors.

VI. Post-Trial Matters

A. Scheduling

i. Post-Trial Hearings

Specially-set post-trial hearings, including hearings to determine the extent of damages, must be scheduled directly with the Eighth Circuit Staff Attorney Emily Sanders. Please call (615) 880-2592 or email EmilyASanders@jnsnashville.gov to find an acceptable date.

Once the date has been confirmed with the Court, the requesting party shall E-file a General (Proposed) Order setting the hearing. The Court will then specially set the hearing on the Court's calendar.

B. Post-Trial Motions

The procedures regarding post-trial motions are the same as those outlined above in Sections IV(A)–(D).

C. Final Orders

- i. The procedures regarding final orders in jury trials are the same as those outlined above in Sections IV(E)(i)–(v).