

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 Cumberland. 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. 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 preferences, and local standards of practice and civility.

B. Correspondence with the Court

Judge Ingram prefers that all communication be by pleadings, notices, memoranda, and briefs. Written correspondence should not replace or augment pleadings, motions, or other papers that may be filed with the Court.

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 Judicial Assistant 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.

III. Pretrial Matters

A. Scheduling

i. Case Management Conferences

In jury cases, the Eighth Circuit Court Special Master 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 the Special Master 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 each 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 Court Law Clerk, Lexi Woods. Please call (615) 880-2592 to find an acceptable date. (Note: In jury cases, parties will work with the Special Master and the Eighth Circuit Court Law Clerk when scheduling a pretrial conference. As such, the previously procedure may vary.)

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 for 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 within less than two weeks' time, Court permission is required. Upon the granting of Court permission allowing for the motion to be heard, 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 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 should 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 should 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 (14) 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 (37) days after it is filed unless the parties otherwise agree.

Judge Ingram may at her discretion allow a motion to be heard earlier than required by Local Rule § 26.03 if all parties agree and if Court permission is granted.

iii. Responses

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 that the motion is set to be heard. Responses must also be served on all parties before this time. Please adhere to this Rule as closely as possible.

iv. Failure to Appear

If any party does not appear as scheduled on a motion (or any other matter scheduled to be heard on the Motion Docket), the Court may choose to strike, adjudicate, or reset the motion to be heard on a later date.

v. Late Appearance

Any party or counsel who will be late for a motion hearing shall notify Eighth Circuit Court Law Clerk, Lexi Woods, via email at lexiwoods@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. Waiver of Motion Argument

Oral argument of a motion may be waived by agreement of counsel pursuant to Local Rule § 25.04. The Court must be notified of this agreement prior to the hearing date. Counsel shall also notify the Eighth Circuit Court Clerk in writing after all briefs are filed as required by Local Rule § 25.04.

C. Motion for Expedited Hearing

To schedule a motion on an expedited basis without the agreement of the 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 should 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.

D. Striking a Docketed Motion

A party wishing to strike his or her motion which is set to be heard shall E-file a Notice Striking the motion. Please note that the Court does not receive notice of Notices to Strike filed within the time limits set forth in Local Rule § 26.04(e). Therefore, the Court appreciates receiving written or oral notice when a party strikes his or her motion following/after the Monday before a Friday Motion Docket.

If a motion is to be stricken without agreement from the parties, the movant may strike the motion upon timely notice to all parties.

E. Continuing a Docketed Motion

Please see Section III(B)(ii).

F. Motions in Limine

i. Standard

Motions in Limine should 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 should 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 at least two weeks in advance of 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.

G. Motions with Late Responses

Late responses generally are not considered by the Court. If the parties agree to allow a non-movant to respond late to a motion, the Court will consider the late response so long as the Court has been notified of the agreement in advance.

H. Motions with No Responses

Judge Ingram will call each case on the Motion Docket, including motions with no responses. The preference of the Court is that all parties appear for each Motion Docket. This is to remain fair to parties who have received notice of the hearing and to give opposing counsel an opportunity to appear.

I. Filing Orders

i. Proposed Orders

A Proposed Order should be filed by the prevailing party representing the Court's ruling on a motion within seven (7) calendar days of the motion hearing, pursuant to Local Rule § 33.01(a).

ii. Objections

If the opposing side objects to the language contained in the Proposed Order, the Court must be notified of the objection within three (3) calendar days of the Proposed Order's submission. A competing Proposed Order must be submitted for the Court's consideration within seven (7) calendar days of the objection.

iii. Signature Line

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

V. Trial Procedures

A. Out-of-Town Parties, Witnesses, or Attorneys

If there is a request to be heard out of order, the Court will reasonably accommodate the parties.

B. 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.
- 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.

C. 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. If you would like to address all jurors in the courtroom, please make that request prior to voir dire.
- v. After you have addressed the first group of jurors in the box, address only the newly seated jurors who replace the excused jurors.
- vi. You may use your challenges per party against any juror until your challenges are exhausted. Back striking is permitted.

D. Notetaking by Jurors

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

E. 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 should not exceed a reasonable time based upon the complexity of the case.

F. 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.

G. Closing Argument

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

H. 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.

I. Proposed Jury Instructions and Verdict Forms

Proposed jury instructions and the verdict form should be provided to the Court no later than three (3) business days in advance of trial. When submitting proposed jury instructions, attorneys must provide the full text of each proposed instruction that they are requesting in a Word document.

A jury charge conference will be held with the attorneys to discuss the jury instructions and verdict form.

Jurors are allowed to refer to a copy of the instructions and the verdict form in the jury deliberation room.

J. Jury Deliberations

- 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 remain reasonably close and must let the court officer know how they can be contacted.
- 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 Court Law Clerk, Lexi Woods. Please call (615) 880-2592 to find an acceptable date.

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. Post-Trial Motions

The procedures regarding post-trial motions are the same as those outlined above in Sections III(A)(i); (III)(B)(ii); IV(A)-(E), (G) and (H). I.e., setting a motion to be heard; motion dockets; continuances and strikes; waiver of motion argument; and motions with late or no response.

C. Final Orders

i. Submission

Unless otherwise directed, counsel for the prevailing party shall prepare orders for entry by the Court upon conclusion of jury and non-jury cases. All Proposed Final Orders representing the Court's ruling must be received by the Eighth Circuit Court

Clerk and served on opposing counsel within seven (7) calendar days following the day on which the ruling is made, pursuant to Local Rule § 33.01(a).

ii. Objection

If opposing counsel objects to the contents of the Proposed Final Order, the Court must be notified of the objection within three (3) calendar days of the Proposed Final Order's submission. If the Clerk receives no objection within the three (3) calendar day period, the order will be submitted to Judge Ingram.

iii. Disagreement over Contents

If there is disagreement as to the terms, each party must submit a Proposed Order for the Court's consideration.

iv. Court Costs

All final judgments must contain language taxing court costs as designated by the parties involved in the case. The Clerk may refuse to enter any proposed final judgments or compromise and settlement orders until such language is added and court costs are paid.