

HON. ASHLEE CRAWFORD, A.J.S.C.
New York Supreme Court, New York County, Civil Term
111 Centre Street, Courtroom 1166
New York, New York 10013

~~ INDIVIDUAL PART RULES ~~
Effective April 8, 2026

Part Clerk: Leticia Rodriguez SFC-Part38-Clerk@nycourts.gov 646-386-3235	Principal Court Attorney: Daniel Kessler dkessler@nycourts.gov Assistant Law Clerk: Ayana Tan aytan@nycourts.gov
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General Rules

1. No Recording or Photographing: Recording or photographing of any Court proceeding, either in person or virtual, is strictly prohibited (22 NYCRR § 29.1[a]), including through the use of artificial intelligence (AI) assistants or bots, or “smart glasses.”
2. E-Filing: I.A. Part 38 is an e-filing part; all documents shall be filed via NYSCEF. Self-represented parties may seek assistance at the Help Center at 60 Centre Street, Room 119A.

All e-filed documents must be text-searchable in an OCR-enabled format that permits copying and pasting. The Court prefers that electronically-submitted memoranda of law contain bookmarks.

3. Working Copies: The Court does not require working copies of documents filed electronically, unless specifically requested.
4. E-Track: In order to e-Track their cases, the parties must file their appropriate appearances via NYSCEF. The parties must maintain current email addresses in NYSCEF and monitor the address provided (22 NYCRR § 202.5-b[f][2][i]).
5. ADA Requests: Any party requesting an ADA accommodation should visit the Court System website for information and guidance (www.nycourts.gov). Any further questions should be directed to the Part Clerk.
6. Interpreter Requests: Requests for a language interpreter should be directed to the Part Clerk as soon as known, but not less than 21 calendar days before an appearance.

7. Preferred Name or Pronouns: Counsel or self-represented parties may directly inform Justice Crawford during a Court appearance, or her Law Clerks by email copying all parties, of their preferred name or pronouns.
8. Redaction of Confidential Personal Information: The parties shall omit or redact confidential personal information in papers submitted to the Court for filing (*see* 22 NYCRR § 202.5[e][1]).
9. Professional Development of Junior Attorneys: The Court supports the professional development of junior attorneys and encourages their participation in trials, oral argument, conferences, and any other speaking roles in the courtroom. Such attorneys should feel free to notify the Court if they are appearing or arguing for the first time or otherwise lack in-Court experience.
10. Artificial Intelligence (AI): The Court acknowledges the increasing adoption of artificial intelligence tools in litigation. Court users are reminded of their ethical duties under the Rules of Professional Conduct, and any other applicable rules, requiring accuracy and authenticity in their submissions to the Court.

Communications with the Court

1. **NO EX PARTE COMMUNICATIONS WILL BE ENTERTAINED.**
2. **DO NOT CALL CHAMBERS BEFORE READING THE FOLLOWING RULES.**
3. **DO NOT DIRECTLY EMAIL JUSTICE CRAWFORD UNLESS INSTRUCTED TO DO SO.**
4. Telephone Calls and E-mails to Chambers: telephone calls and e-mails to chambers are **only permitted in situations requiring immediate attention that cannot otherwise be obtained through written correspondence or by contacting the Part Clerk.**
5. Letters: Communications with the Court shall be in writing, filed via NYSCEF and emailed to the Part Clerk, with copies simultaneously delivered to all counsel or self-represented parties. All correspondence must: (1) bear the full title and index number of the action; (2) indicate that a copy was sent to all counsel or self-represented parties; and (3) state the request or relief sought from the Court.
6. Notification of Stays, Settlements, Discontinuances, Withdrawal of Motions: If an action or motion is settled, discontinued, disposed, or withdrawn in any manner, or if any party dies or initiates a bankruptcy proceeding, counsel must **immediately inform the Court by letter filed via NYSCEF and emailed to the Law Clerks and the Part Clerk.** The

parties shall file via NYSCEF, and email the Part Clerk, a fully executed stipulation of settlement or discontinuance as soon as practicable.

7. Do not copy the Court on written communications between counsel or parties unless explicitly requested by the Court.

Appearances

1. In-Person Appearances: All Court appearances will be in person, unless otherwise indicated.
2. Counsel for all parties, or any self-represented parties, must be present at all appearances.
3. Knowledge & Authority: Appearing counsel must be familiar with the case, and be fully prepared and authorized to discuss and resolve the issues which are scheduled to be addressed at the appearance. Failure to comply with this rule may be treated as a default for purposes of Uniform Court Rule 202.27 and/or may be treated as a failure to appear for purposes of Uniform Court Rule 130.2.1 (22 NYCRR § 202.1[f]).
4. Failure to Appear: Failure to appear at any scheduled appearance may result in default, inquest, or dismissal (22 NYCRR § 202.27).

Scheduling and Calendar Matters

1. Any inquiries regarding scheduling and calendar matters shall be directed to the Part Clerk.
2. Requests for forms shall be directed to the Part Clerk.
3. Requests to Adjourn an Appearance or Motion: A request for an adjournment of an appearance or motion shall be made in writing at least 48 hours prior to the appearance or motion deadline, on notice to all parties, filed via NYSCEF and copying the Part Clerk at SFC-Part38-Clerk@nycourts.gov. Any party seeking an adjournment must attempt to obtain consent of all parties. Applications for an adjournment must state: (1) the appearance/motion date; (2) the reason for the requested adjournment; (3) whether the request is made on consent of all parties; and (4) provide suggested adjourned dates or times. Any stipulation adjourning a motion must be so-ordered.
4. Requests to Adjourn Hearings or Trials: A request for an adjournment of a hearing or trial is not permitted except as provided for in 22 NYCRR § 125.1 (“Engagement of counsel”).

Discovery

1. **DO NOT FILE A DISCOVERY MOTION BEFORE READING THE FOLLOWING RULES.**

2. Adherence with Discovery Schedule: Parties shall strictly comply with discovery obligations by the dates set forth in all case scheduling orders. Applications for extension of a discovery deadline shall be made as soon as practicable and prior to the expiration of such deadline (22 NYCRR § 202.20-e).
3. Sanctions for Non-Compliance: Non-compliance with discovery deadlines set forth in case scheduling orders may result in the imposition of an appropriate sanction against the non-compliant party or other relief pursuant to CPLR 3126 (22 NYCRR § 202.20-e).
4. Discovery Conference: The parties must work in good faith to resolve any discovery issues prior to seeking Court intervention (22 NYCRR § 202.20-f). If their efforts are unsuccessful, they should request an expedited conference with the Court by filing a letter via NYSCEF and emailing the Part Clerk, setting forth (1) their request for an expedited discovery conference; (2) the discovery issue to be addressed; and (3) details of their good faith efforts at resolution.
5. Discovery Motions: The parties are very strongly encouraged to conference with the Court prior to filing a discovery motion.
6. Conferences: Except as otherwise indicated, conferences will be held in person at 111 Centre Street, Room 1166, on Wednesdays, at 10:00 AM.

Preliminary Conferences: However, if all parties agree to a discovery schedule in advance of a scheduled preliminary conference, they may submit a proposed preliminary conference order to the Court by 5:00 PM on the Friday before the scheduled conference by emailing a copy to the Part Clerk. The stipulation will be reviewed and, if approved, so-ordered by the Court. Absent such stipulation, the parties must appear for the conference. Parties shall use the Part 38 preliminary conference order template, and all parties must fill in their appearance.

Compliance & Status Conferences: The parties shall appear in person for all compliance and status conferences, unless otherwise permitted by the Court.

Prior to each conference, the parties shall confer about (i) resolution of the case; (ii) discovery, including disclosure of electronically-stored information (ESI); and (iii) the use of ADR to resolve some or all issues in the litigation. The parties shall make a good faith effort to reach agreement on these matters in advance of the conference.

7. Confidentiality Stipulations: In the interest of reducing unnecessary litigation costs, any order regarding the confidential exchange of information must adhere to the Proposed Stipulation and Order for the Production and Exchange of Confidential Information (the Model Form), which is attached as Appendix B to the Commercial Division Rules.

If the parties believe there is good cause to depart from the Model Form, they must submit the following: (1) the proposed stipulation and order; (2) a red-lined version of the proposed stipulation and order, indicating any departures from the Model Form; and (3) a party affirmation establishing good cause for any proposed departures from the Model Form.

Subpoenas

1. Subpoenas generally need not be so-ordered. Requests for the Court to so-order a subpoena shall be supported by an affirmation explaining the need for an order, and shall be uploaded to NYSCEF with a courtesy copy emailed to the Part Clerk and Law Clerks.
2. Subpoenas for trial shall be directed to the Subpoena Records room at 60 Centre Street, Room 145M.

Motions

1. Upload Transcript of Oral Argument: For any pending motions that were orally argued before the prior judge, counsel shall upload a transcript of the oral argument to NYSCEF. The Court may require additional argument, as it deems necessary.
2. No Appearance on Return Date: Personal appearances are not required on the motion return date, unless directed by the Court.
3. Oral Argument: All motions are on submission unless otherwise advised by the Court. Parties may request oral argument by stating “Oral Argument Requested” on the first page of the papers submitted and emailing the Part Clerk to request a date for argument; the Court will determine whether to grant such requests.
4. Proposed Orders: Where appropriate, proposed orders should be submitted with motions (non-dispositive only)(22 NYCRR § 202.8-a[b]) and a courtesy copy shall be emailed *in Word format* to the Law Clerks or Part Clerk.
5. No Sur-Replies: No sur-replies shall be considered absent leave of the Court.
6. Word Count Limits: Parties shall abide by the word count limits set forth in 22 NYCRR § 202.8-b. The Court may permit over-length submissions upon letter application copying all parties and emailed to the Part Clerk.

Notes of Issue and Summary Judgment

1. Note of Issue: Deadlines to file the note of issue are strictly enforced. Requests to extend the note of issue deadline will be granted only upon good cause. To request an extension of the note of issue deadline, the parties may (i) submit a stipulation; (ii) submit a letter setting forth the reasons why discovery could not be completed by the current

deadline and the shortest possible time needed to complete discovery; or (iii) request a discovery conference prior to the deadline.

2. Summary Judgment: Summary judgment shall be filed within 120 days of the filing of the note of issue, unless otherwise directed by Court order.

Settlement Conferences, Pre-Trial Conferences, ADR

1. Requesting a Settlement Conference: The parties may request a settlement conference with the Court at any time after issue is joined and discovery has been exchanged by contacting the Part Clerk or informing the Court during an appearance.
2. Knowledge & Authority to Settle: Counsel or parties must appear at settlement conferences fully familiar with the case and with authority to settle, and must engage in good faith settlement negotiations (22 NYCRR § 202.26). Parties and claims representatives must be available by telephone at the time of the conference.
3. Pre-Trial Conference: Prior to trial, counsel shall confer in good faith to identify matters not in contention, resolve disputed questions without need for Court intervention, and further discuss settlement of the case (22 NYCRR § 202.26). Following the filing of a note of issue and, where applicable, the Court rendering a decision on summary judgment not fully disposing of the case, the case will be referred to Part 40 for a pre-trial conference.
4. Alternate Dispute Resolution (ADR): Parties interested in pursuing Court ADR should contact the Part Clerk or inform the Court during an appearance.