PROPOSED HEARING-SAFE MOTION ARCHITECTURE

Public-safe summary · not the private filing · not an adjudicated finding

Requested safeguards

- Advance written proffer of any disputed attorney-only fact counsel intends to place before the court.
- No unsworn personal-knowledge assertions from counsel table.
- Stipulations and records for authenticity, receipt, dates, and written positions.
- Other witnesses and evidence before counsel testimony.
- Short Rule 104-style prehearing review only if a material attorney-only fact remains.
- Hearing-specific substitution only if counsel is a necessary witness and no exception applies.
- Privilege protection and a written ruling outside the party's limited merits time.

Why the new approach is narrower

It does not seek case-wide punishment, does not treat emails as proof of every underlying fact, does not rely on confidential grievance submissions as findings, and does not allege an unproven connection to the August 3 medical restriction. It asks the court to determine the advocate-witness boundary before the merits hearing.

Status: proposed, unfiled drafting architecture as of August 20, 2026. The Court retains discretion over procedure, hearing, evidence, and remedy.