

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

JERI MAGUIRE

v.

FRANK CUSHMAN

DOCKET NO. PLAY-1N-26

PRE-TRIAL ORDER

Local Rules to Expedite Trials

1. No “housekeeping” is permitted, so the Court advises as follows: Witnesses are pre-sworn and exempt from sequestration under FRE 615. All exhibits retain their original markings and, if admitted, may be published at any time.

General

2. The Plaintiff, Jeri Maguire, has sued the Defendant, Frank Cushman, for breach of contract.
3. The Plaintiff will call Jeri Maguire. The Defendant will call Matty Cushman. No other witnesses may be called. This does not preclude reading in depositions. Witnesses may not be recalled live. All witnesses are the gender of the student playing the witness.
4. This case is bifurcated. The parties will try the liability phase.
5. The only citable legal authorities are the Jury Instructions, Federal Rules of Evidence (“FRE”), Federal Rules of Civil Procedure (“FRCP”), and this Pre-Trial Order.

Evidentiary Rulings

6. All notice requirements under the FRE have been satisfied.
7. All individuals, other than those testifying at trial, are “unavailable” under FRE 804(a).
8. The numbered exhibits in this case file are the only exhibits that parties may offer into evidence and the only items to which “best evidence” objections may be made.
9. At all depositions, both parties had an opportunity to question the witness.
10. Exhibit 4, produced by Stebbins Mobile, is a business record under FRE 803(6). The Court reserves ruling on all hearsay-within-hearsay issues.

Stipulations

The parties stipulate that the following facts are true and may be read to the jury at trial:

11. The signatures that appear on materials in the Joint Exhibit List are the signatures of the individuals from whom they purport to be.
12. Exhibit 4 contains all phone calls and text messages that are relevant to this case.

13. When deposed, Dorothy Shepard-Maguire gave the following testimony: “On April 23rd, 2024, Jeri told me – first by text as you see in Exhibit 4 and then in person – that Jeri had signed Frank Cushman as a client. Jeri said it was a handshake deal with Matty Cushman, but Jeri trusted Matty. Jeri and I celebrated over champagne that night.”
14. When deposed, Frank Cushman gave the following testimony: “On April 23rd, 2024, Jeri came to our house. I told my parent, Matty, ‘You decide who my agent is. I just want to play football.’ That night, Matty told me, ‘I left it open. We’ll see who comes through for us, Jeri or Bobbi.’ I always liked Jeri.”
15. Since Jeri Maguire’s termination from CSI, Frank Cushman has refused to make any payments to Maguire as described in Exhibit 2.

The parties stipulate that the following facts are true, but reserve the right to object only under Federal Rules of Evidence 401-404 before they are read to the jury:

16. In May 2024, the Los Angeles Chargers lodged a complaint to the National Football League Players Association against Jeri Maguire for fraudulently purporting to represent Frank Cushman on April 23rd, 2024. The National Football League Players Association investigated and decided not to impose any penalty on Maguire.

Joint Exhibit List

- | | | |
|-----------------------|------------------|-----------------------|
| 1. Contract - 2/2/24 | 4. Phone records | 7. Maguire deposition |
| 2. Unsigned contract | 5. Receipt | 8. Cushman deposition |
| 3. Contract - 4/24/24 | 6. Hat | 9. Sugar deposition |

Date: April 24, 2026

Bryan Walker
Hon. Bryan Walker