

STANDING PRE-TRIAL ORDER FOR JURY TRIALS
DIVISION "C"
16TH JUDICIAL DISTRICT COURT

IT IS ORDERED that the following rules shall apply to all pre-trial conferences in Division "C" of this Court.

1. Upon notification that a pre-trial conference is scheduled, counsel for plaintiff shall promptly arrange a meeting of all counsel, sufficiently in advance of the pre-trial conference, for the purpose of arriving at all possible stipulations. All counsel shall view and exchange copies of exhibits which will be offered in evidence, prepare a list of the names and addresses of all witnesses who may testify at the trial, and prepare a required Joint Pre-Trial Stipulation, hereinafter described, for submission to the Court. All other counsel shall cooperate with counsel for plaintiff in facilitating and expediting this meeting.
2. Counsel for plaintiff will promptly prepare and submit to all counsel a proposed Joint Pre-Trial Stipulation that is based upon the discussion held at the meeting. All counsel shall promptly notify plaintiff's counsel in writing of any additions, corrections, or matters on which no agreement is possible. In order to retain the trial fixing, the final draft of the Joint Pre-Trial Stipulation shall be submitted to the Court and counsel within FIVE (5) WORKING DAYS prior to the pre-trial conference and shall be signed by all counsel either prior to or at the pre-trial conference. The Joint Pre-Trial Stipulation must be approved by the Court.
3. The Joint Pre-Trial Stipulation shall set forth:
 - A. A brief but comprehensive statement of the contentions of each party.
 - B. A brief statement of all facts established by the pleadings, stipulations or admissions.
 - C. A brief statement of the contested issues of fact.
 - D. A brief statement of the contested issues of law.
 - E. A list and brief description of all exhibits (except exhibits offered solely for impeachment) to be offered in evidence together with a statement that the authenticity of said exhibits has been stipulated except as otherwise stated and a statement of any objections to said exhibits.
 - F. A list and brief description of all items of demonstrative evidence to be used by each party.
 - G. A statement that no further amendment of pleadings is anticipated.
 - H. The name and addresses of each witness whom each party may call, together with a short statement of the nature of the expected testimony. With respect to expert witnesses, the statement shall describe the area of expertise in which the witness will offer expert testimony.
- NOTE WELL: Each and every witness must be named in the Joint Pre-Trial Stipulation. A witness shall not be designated as a representative nor named at a later date, unless specific agreement is obtained from all parties.
 - I. A brief statement as to any other matters, not previously covered, which may be relevant to a prompt and expeditious disposition of the litigation.
 - J. A statement as to the probable length of the trial.
4. The trial attorneys shall attend the pre-trial conference unless excused by the Court for good cause shown. Counsel attending the pre-trial shall be fully prepared to inform the Court on all matters pertinent to the litigation, discuss all issues of the case, and shall be fully authorized to agree to deadlines, enter into stipulations, agreements, admissions of fact or law, and settlement. Following the conference, the Court will designate counsel to prepare a Pre-Trial Order to be submitted to the Court.
5. The Clerk of Court shall furnish to all counsel of record a copy of this order with notice of the place, date, and hour assigned for the pre-trial conference.

6. If there has been a previous pre-trial conference in a case, and the Joint Pre-Trial Stipulation has been previously approved by the Court, but there is need to change the date of trial, counsel need not prepare an additional Stipulation nor attend an additional pre-trial conference. Counsel may signify their mutual agreement by correspondence to the Court.
7. The cut-off date for discovery shall be THIRTY (30) WORKING DAYS prior to the trial, unless the Court permits an extension of this deadline for good cause.
8. All depositions to be used in lieu of live testimony shall be submitted to the Court within SEVEN (7) WORKING DAYS prior to trial. The failure of counsel to submit depositions in a timely manner may result in the Court's refusal to accept these documents into evidence.
9. Any special charges and special verdicts to the jury shall be submitted to the Court and counsel within TEN (10) WORKING DAYS prior to trial. Any objections to special jury charges shall be submitted within FIVE (5) WORKING DAYS prior to trial. All counsel must agree to the form of the verdict.
10. All motions in limine shall be filed with the Clerk of Court FIVE (5) WORKING DAYS prior to the trial. A copy of all motions and memorandums shall be provided to the Court and opposing counsel within FIVE (5) WORKING DAYS prior to trial.



VINCENT J. BORNE, Judge
Division C