

**TWENTY-SIXTH JUDICIAL DISTRICT
PRE-TRIAL MEMORANDUM
JUDGE THOMAS A. JAMES, JR., P.J.**

_____,
Plaintiff(s),

vs.

IN THE COURT OF COMMON
PLEAS FOR THE 26TH JUDICIAL
DISTRICT COLUMBIA/MONTOUR
COUNTY BRANCH, PENNSYLVANIA

CIVIL DIVISION - LAW

NO. _____-CV-201__

_____,
Defendant(s).

LIST ALL PARTIES AND COUNSEL TO ACTION:

Counsel for Plaintiff:

Counsel for Defendant:

Name: _____
Address: _____
City/State: _____
Telephone: _____

Name: _____
Address: _____
City/State: _____
Telephone: _____

DATE OF PRE-TRIAL: _____

1. A concise statement of the claim or defense on liability and damages (Your version of facts - liability - attach any helpful diagram):

2. List separately the issues involved on liability and damages:

a. Give detailed description and itemized statement of damages. (attach another sheet if necessary)

3. Legal theory of liability - list those theories upon which you will rely, as each party may be limited to those theories at trial.

4. If there is a counterclaim, set forth the theory of liability and contentions on damages.

5. If an agreement is involved in this action is it written or oral? _____

a. Quote the provisions of the agreement which are central to this dispute. (attach if necessary)

6. List separately those attorneys present at the attorney conference and identify the party each represents and the date of the attorney conference;

7. List separately each witness on liability and on damages, showing the address of each and a concise summary of each witness's proposed testimony;

8. Expert witnesses - State expected scope of testimony.

9. List separately exhibits on liability and damages on attached index and indicate whether exhibits have been shown to opposing Counsel. Each party may be limited to the use of the listed exhibits at trial.
10. List all deposition transcripts to be used in lieu of testimony and a statement of known objections thereto;
11. A statement of all stipulations sought from opposing parties;

12. A statement of any special request, such as request for a view, special time for a witness, unusual scheduling problems, courtroom needs, etc.;

13. A list for any special *voir dire* examination of prospective jurors requested by counsel;

14. Identify any unusual legal issues which counsel expect to arise in the case. Motions in Limine should be filed no later than the date for submission of the Pretrial Memorandum; and,

15. Provide statement of the status of settlement negotiations to date.

16. Has there been a timely demand for a jury trial?
YES _____ NO _____

17. Estimate time to try: _____

18. Any other matter which you feel is important by which
has not been covered:

Counsel are required to be prepared to inform the Court of the demand and offer and to discuss settlement. (Party must be available in person or by phone at the time of Pre-Trial Conference for purpose of settlement discussions.) Attached hereto shall be a summary of the status of settlement negotiations to date, as per L.R. 212.3 (b), together with any legal issues required to be determined prior to trial, e.g., Motions in Limine.

Respectfully Submitted,

PRINT NAME:

INDEX TO EXHIBITS

Plaintiff's or State's Exhibits	For Identification	In Evidence
Defendant's Exhibits	For Identification	In Evidence

INDEX TO EXHIBITS

Plaintiff's or State's Exhibits	For Identification	In Evidence
Defendant's Exhibits	For Identification	In Evidence