## **IN THE CIRCUIT COURT OF THE**

## **FOURTEENTH JUDICIAL CIRCUIT**

## **IN AND FOR BAY COUNTY, FLORIDA**

**CIVIL DIVISION**

**CASE NO.: CA**

**Plaintiff(s),**

**v.**

**Defendant(s).**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**UNIFORM ORDER SETTING CAUSE FOR TRIAL AND PRE-TRIAL CONFERENCE**

               This Court, finding that the parties have had adequate time to litigate this matter and being otherwise fully advised in the premises, hereby

**ORDERS** as follows:

**TRIAL DATE**

1. The above-titled cause is hereby set for TRIAL during the week of **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, commencing at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, A.M./P.M. CT,** or as soon thereafter as counsel may be heard, at the **Bay County Courthouse 300 East 4th Street, Panama City, Florida 32401.** Trials are normally set for weekly periods. All counsel with trials set for a trial period shall be prepared to go to trial on the first day of the week of the period and shall remain available for the entire week.

**TRIAL DEADLINES**

2. Expert Witness Disclosure- Plaintiff: No later than **130 days** prior to the trial date, Plaintiff shall serve on all other counsel and file with the Court, a notice containing the following information regarding each expert Plaintiff believes will testify at trial:

a. the name, address and telephone number of the expert witness;

b. the area of expertise of the witness (*i.e.,* “accident reconstruction,” “economist,” “orthopedic physician,” *etc.*) and the subject matter of the expected testimony;

c. a complete and updated curriculum vitae;

d. a summary of the opinions and grounds on which the opinions of the expert witness will be based;

e. all other information as required by Florida Rule of Civil Procedure 1.280(b)(5); and

f. two (2) alternate dates of availability of each expert witness for the purpose of taking the expert’s deposition, which dates shall be no later than **80 days** prior to the trial date.

Expert Witness Disclosure- Defendant: No later than **110 days** prior to the trial date, each Defendant shall serve on all other counsel, and file with the Court, a notice containing the same information as set forth in sections (a)-(f) above regarding each expert witness who will testify at trial on behalf of Defendant. This notice shall also include two (2) alternate dates of availability of each expert witness for the purpose of taking their deposition, which dates shall be no later than **70 days** prior to the trial date.

Expert Witness Reports: All reports or other data compiled by or relied upon from each disclosed expert and intended to be used by the expert at trial or deposition shall be provided electronically to the opposing party at least **5 days** prior to the date of the deposition.

Failure to Abide by Expert Requirements: The Court expects the parties to conduct discovery in good faith. Nothing in the foregoing should be interpreted to cause discovery regarding experts to commence on the deadlines referenced above. If any expert or party fails to meet the requirements as set forth herein, the Court will consider excluding the testimony of the expert at trial or, in the alternative, may limit the testimony of the expert to those matters revealed at any such deposition or in answers to any such interrogatories.

*Daubert* Motions and Hearings: Any challenge to the admissibility of evidence at trial asserted to be “novel scientific evidence” or based on a contention that anticipated expert testimony does not meet the requirements of section 90.702, Florida Statutes, and seeking a ruling in accordance with the decision in *Daubert v. Merrell Dow Pharmaceuticals*, 509 U.S. 579 (1993), must be raised by a specific motion which shall be filed no later than **65 days** prior to the trial date. Any *Daubert*-related motion or objection shall state with particularity the grounds upon which it is based and the substantial matters of law to be argued and shall specifically identify any evidence or supporting material on which the movant relies. Any *Daubert*-related motion shall be *set for an evidentiary hearing and heard* no later than **40 days** prior to the trial date. The failure to meet the deadlines set forth herein shall be deemed a waiver of such objection, absent good cause. Further, the Court may summarily rule on any *Daubert*-related motion not complying with the requirements set forth herein.

3. Fact Witness Disclosure: No later than **120 days** prior to the trial date, the parties must file and serve a list of names and addresses of all fact witnesses who may testify at trial, including witnesses expected to be called for impeachment or rebuttal. Each party’s fact witnesses must include a brief description of the substance and scope of the testimony to be elicited from such witness.

4. Discovery Deadlines: All depositions, paper discovery and all examinations of persons and any report related thereto must be completed at least **75 days** prior to the trial date. Any discovery requiring a response from an adverse party must be served in time for the response to be due prior to the deadline date established herein.

5. Mediation: Mediation must commence no later than **65 days** prior to the trial date. Plaintiff’s counsel (or Defendant’s counsel if Plaintiff is unrepresented) is appointed lead counsel to facilitate and work diligently towards ensuring that the parties comply with the mediation requirement set forth herein. If the parties are unable to agree on a mediator and/or a place for the mediation, counsel shall notify the Court no later than **90 days** prior to the trial date and each party shall provide the Court with two (2) preferred mediators and a proposed order appointing a mediator.

6. Non-Dispositive Motions: All motions related to discovery and other non-dispositive motions shall be *filed* no later than **75 days** prior to the trial date and must be *heard* no later than **30 days** prior to the trial date. All motions to amend the pleadings, however, shall be filed no later than **100 days** prior to the trial date. It is the responsibility of the attorney who files any motion to ensure that it is timely scheduled on the Court’s calendar. Any undue delay in attempting to scheduling a non-dispositive motion may deem it moot by the Court.

7. Dispositive Motions: All dispositive motions, including motions for summary judgment, must be *heard* no later than **40 days** prior to the trial date. It is the responsibility of the attorney who files any motion to ensure that it is timely scheduled on the Court’s calendar. It is also the responsibility of the attorney who files the motion to ensure that the motion (particularly any motions for summary judgment) can be heard in compliance with the rules as set forth in the Florida Rules of Civil Procedure. Further, all parties should review and comply with the Court’s “Procedures for Pleading, Scheduling and Hearing Non-Default Summary Judgment Motions”.

8. Motions in Limine: All case-specific motions in limine shall be *filed* no later than **70 days** prior to the trial date and must be *heard* no later than **40 days** prior to the trial date. The motion shall state with particularity the grounds upon which it is based and the substantial matters of law to be argued and identify any evidence or supporting materials on which the movant relies. The Court may summarily rule on any motion and deny any motion not filed or set in a timely fashion. All motions in limine must relate to specific evidence to be offered at trial. The Court *will not* hear or consider “boiler-plate” motions in limine as all attorneys and unrepresented parties are responsible for knowing the applicable rules of evidence and rules of civil procedure. Some examples of “boiler-plate” motions are motions seeking the exclusion of “golden rule” arguments in closing, motions seeking to prevent counsel from expressing personal beliefs, *etc*.

9. Exhibit Lists: Each party must file an exhibit list no later than **50 days** prior to the trial date which reflects all exhibits intended to be offered at trial, including rebuttal exhibits. Said filing must separately list all exhibits the party intends to introduce into evidence at trial. Each item/exhibit must be listed by number for Plaintiff and letter for Defendant and contain a description of the exhibit. Generic descriptions of exhibits are subject to be stricken. At trial, only those exhibits properly listed may be offered into evidence. Each party shall be prepared to establish the inclusion of any exhibit on the Exhibit List if the other party challenges the production or authenticity of such exhibit at trial. All exhibits which are the subject of any objection raised in the pretrial stipulation phase shall be brought to the Pretrial Conference for discussion by the party raising the objection.

Prior to opening statements, counsel for each party shall deliver to the trial clerk an Exhibit List that contains an itemized list of all exhibits to be introduced during trial. All exhibits shall be pre-marked for identification. Those exhibits that will be admitted into evidence by stipulation of the parties or without objection shall be further pre-marked accordingly as exhibits in evidence. Prior to opening statements, the parties shall communicate with the trial clerk to coordinate the marking, organization, and handling of exhibits.

No later than **50 days** prior to the trial date, pursuant to the holding in *Northup v. Acken*, 865 So. 2d 1267 (Fla. 2004), all parties shall identify, disclose and exchange *all* materials reasonably expected or intended to be used at trial for witness impeachment, including, but not limited to: deposition and trial transcripts of testimony given in unrelated actions; medical literature; articles; learned treatises; video or audio recordings; and publications. If such materials are reasonably expected to be disclosed to the Court or jury at trial, then they must be identified, disclosed, and copies provided to the adverse party in accordance with this order. Such impeachment materials shall be included on the parties’ respective Trial Exhibit Lists. The disclosure of such *Northup* impeachment materials shall include, as it concerns deposition and trial transcripts of testimony given in unrelated actions, page and line designations of such transcripts reasonably expected or intended to be used at trial for witness impeachment.

10. Trial Witness Lists: Plaintiff must file a witness list (this list is different than the above-referenced fact witness disclosure) no later than **60 days** prior to the trial date. Said list shall contain the names and addresses of all witnesses intended to be called in trial in alphabetical order. The list must also designate the type of witness (“expert,” “rebuttal,” “impeachment,” “general fact,” *etc*.). It must also include a brief description of the substance and scope of the testimony to be elicited from each witness. All expert witness designations must also include the expert’s specialties on the list and attach a copy of the expert’s curriculum vitae. Any witness not disclosed as described herein shall not be permitted to testify at trial without an order of the Court.

Defendant must file a witness list (this list is different than the above-referenced fact witness disclosure) no later than **50 days** prior to the trial date. Said list shall contain the names and addresses of all witnesses intended to be called in trial in alphabetical order. The list must also designate the type of witness (“expert,” “rebuttal,” “impeachment,” “general fact,” *etc*.). It must also include a brief description of the substance and scope of the testimony to be elicited from each witness. All expert witness designations must also include the expert’s specialties on the list and attach a copy of the expert’s curriculum vitae. Any witness not disclosed as described herein shall not be permitted to testify at trial without an order of the Court.

11. Hearing Time Anticipation: Each party should expect a period of at least **20 days** between requesting a hearing date and the actual hearing date for a hearing lasting less than thirty (30) minutes and should expect a period of at least **40 days** between requesting a hearing date and the actual hearing date for a hearing lasting longer than thirty (30) minutes. Thus, each party should request any needed hearing well in *advance* of the deadlines set forth herein. It is up to each party to ensure that there is sufficient and adequate planning and preparation to fulfill the deadlines set forth herein. The Court may summarily deny any motion upon a finding that a party unreasonably delayed setting the motion for hearing, that the motion was not timely filed to obtain a hearing within the deadlines provided, or that it is prejudicial to the other side. The inability of a party to obtain a hearing time in accordance with the expectations set forth herein will generally not constitute grounds for an extension of the deadlines, nor will it constitute grounds for a continuance of the trial.

**PRETRIAL CONFERENCE**

12. The Pretrial Conference: A Pretrial Conference shall be held in Chambers before the Honorable James J. Goodman, Jr., Circuit Judge, at the **Bay County Courthouse**, **300 East 4th Street, Panama City, Florida 32401,** on **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_\_\_**, commencing at \_\_\_\_\_\_\_\_\_\_ **A.M./P.M. CT,** pursuant to Florida Rule of Civil Procedure 1.200, to consider all matters suggested therein and to simplify the issues to expedite the trial of this cause. At the Pretrial Conference, parties and counsel *shall* confirm that they are prepared for trial. For the full purpose of the Pretrial Conference procedures to be accomplished, it is directed that each party (or corporate representative where appropriate) shall be ***physically present*** at the Pretrial Conference. Furthermore, all attorneys who will be participating in the trial shall be ***physically present***at the Pretrial Conference. The attorneys should be prepared to present the following matters for consideration and discussion at the Pretrial Conference:

1. Compliance with the deadlines and requirements in this Order;

b. Witnesses expected to be called for trial and the availability and location of those witnesses along with the proposed schedule for the trial;

c. Any special arrangements for the presentation of witnesses and other evidence;

d. Any anticipated evidentiary issues at trial;

e. Any stipulations that may obviate the need for foundation witnesses;

f. Any stipulations that may obviate the need to prove facts that are uncontested;

g. Any stipulations that may obviate the need for certain exhibits; and

h. Any other matters that are important to the progress and resolution of the case.

13. Preparation for Pretrial Conference: The attorneys for all parties are directed to meet by agreement, initiated by counsel for the Plaintiff, no later than **7 days** before the Pretrial Conference to:

a. Produce, examine, *and initial* every evidentiary exhibit intended to be offered at trial; agree on those exhibits that can be admitted as joint exhibits and those exhibits that can be admitted without objection; and identify those exhibits to which objections will be made and the grounds for each objection. Any disputed exhibits shall be marked as such on an *attachment* to the proposed Pretrial Conference Order and the grounds for any objection shall be set forth by the objecting party. Objections not reserved, or grounds not noted, on the attachment containing the objections may be deemed waived at trial. Further, the Court may admit into evidence any exhibit not objected to on said list.

b. Review the witness lists provided by each party and identify any witnesses that are being objected to. Any disputed witnesses shall be marked as such on an *attachment* to the proposed Pretrial Conference Order and the grounds for any objection shall be set forth by the objecting party. Objections not reserved or grounds not noted on the attachment containing the objections may be deemed waived at trial. Further, the Court may allow any witness not objected to on said list to testify.

c. The parties shall prepare a proposed “schedule” for trial, which shall be *attached as an exhibit* to the proposed Pretrial Order. The proposed “schedule” shall allocate which witnesses and depositions the parties in good faith anticipate will be called at trial, the order in which the witnesses will be called, and the time allowed for direct examination and cross examination of the witnesses. This proposed “schedule” shall be used by the Court as a guide as to how much time to allocate for the trial of this matter.

d. Stipulate as to any matter of fact and/or law about which there is no issue to avoid unnecessary proof.

e. Agree upon and draft a concise but complete statement of the case to be read by the Court to the jury at the beginning of the case.

f. Review all depositions which are to be offered for any purpose other than impeachment to resolve objections to the portions to be offered in evidence.

g. Discuss the possibility of settlement.

h. Submit an itemized statement of special damages Plaintiff expects to prove, if any.

i. Discuss and complete any other matters that may simplify the issues or aid in the speedy disposition of this action, the Pretrial Conference and at trial.

1. Joint Pretrial Conference Stipulation and Pretrial Conference Checklist: Following the meeting by the parties prior to the Pretrial Conference, Plaintiff’s attorney (or Defendant’s attorney if Plaintiff is unrepresented) shall prepare and present to the opposing party a Joint Pretrial Conference Stipulation and Pretrial Conference Checklist. The aforementioned documents shall be filed, and a copy shall be filed *and* emailed directly to the Judge’s judicial assistant no later than **5 days** prior to the Pretrial Conference. In the event the parties are unable to agree on any matter, the differing views should be specifically set forth in thedocument so that the Court can easily distinguish the preferences of each party. The Court will resolve any disputed matters at the Pretrial Conference. An outline of a DRAFT Joint Pretrial Stipulation *AND* a DRAFT Pretrial Conference Checklist is attached hereto for the parties’ convenience.
2. Jury Instructions and Verdict Form: No later than **10 days** prior to the Pretrial Conference, each party shall submit to opposing counsel proposed jury instructions and verdict forms. The parties shall discuss the proposed instructions and verdict forms at the meeting of the parties prior to the Pretrial Conference and the parties shall attempt to agree to *one set* of proposed jury instructions and verdict forms for use at trial. After discussing the matter, the proposed jury instructions and verdict forms shall be filed, and a copy shall be filed *and* emailed to the Judge’s judicial assistant (in Microsoft Word format) no later than **3 days** prior to the Pretrial Conference. Each instruction shall be on a separate page; shall be in the order the parties desire it to be presented to the jury; shall contain citations of supporting authorities where applicable; and shall designate whether the instruction is being opposed and, if so, the opposing party shall provide a concise objection to the instruction. Any submitted verdict form must also be designated as “agreed to” or “disputed,” and when “disputed,” each party shall cite supporting authorities where applicable.

**EXHIBITS**

1. Marking of Exhibits: All exhibits must be marked in advance of trial using consecutive numbers (for the Plaintiff) and letters (for the Defendant).
2. List of Exhibits: A list of proposed exhibits shall be submitted directly to chambers by each of the parties by the deadline established in the Court’s Trial Order. Each party shall make available to the other party for inspection all exhibits that party intends to introduce at trial.
3. Objections to Exhibits: This Order shall not affect the right of a party to object at the trial to the introduction of an exhibit other than on the basis of authentication and foundation.
4. Preparing Exhibits for Jury Deliberation: Counsel shall confer and review all exhibits prior to closing arguments. The originals of all exhibits admitted at trial should be ready to be turned over to the jury foreperson prior to closing jury instructions so that jury deliberations are not delayed.
5. Filing Exhibits: It is the responsibility of the parties to ensure that the record is complete. All trial exhibits, briefs, proposed jury instructions and proposed verdict forms are to be filed in the record within **five (5) business days** of the verdict.
6. Penalty:  A party who does not abide by the provisions contained in this Order may be subject to sanctions, including, without limitation, the preclusion of the introduction of exhibits at trial by the offending party.

**MISCELLANEOUS INSTRUCTIONS**

1. Jury Respect: All persons in the Courtroom shall rise upon entry/exit of the jury panel or jurors.
2. Objections:  All attorneys shall rise when objecting, state “objection,” and the grounds for an objection. There will be no speaking objections allowed unless clarification of the objection is requested by the Court. If opposing counsel agrees with the objection, he should state that he will rephrase the question before doing so. If further argument regarding an objection is desired, an attorney shall request a bench conference. The Court will provide an opportunity for counsel to supplement the record as needed. All objections and related arguments shall be addressed to the Court and not to opposing counsel.
3. Demonstrative Aids:  In this ever-changing technological world, the Court recognizes that counsel may wish to use demonstrative aids during their opening statement and closing argument. These demonstrative aids may include photographs, diagrams, visual aids, electronic media, PowerPoint presentations, etc.  At least **10 days** prior to trial, counsel shall confer with opposing counsel and show opposing counsel the demonstrative aid. If opposing counsel has an objection, the aid shall not be displayed or played before a jury before the Court has ruled on the objection. In order to have a clear record, counsel using a demonstrative aid shall be prepared to have the aid marked as an exhibit and entered into the record, regardless of whether or not the aid will be introduced into evidence.
4. Deposition Designations: No later than **twenty (20)** days prior to the trial date in this matter, each party shall serve its designation of depositions, or portions of depositions, which it intends to offer as testimony in its case in chief. No later than **ten (10)** days prior to the trial date in this matter, the opposing party shall serve its counter (or “fairness”) designations to portions of depositions designated, together with objections to the depositions, or portions thereof, originally designated. No later than the trial date, each party shall serve its objections to counter designations served by an opposing party.
5. Conduct of Attorneys: Attorneys shall, at all times, strictly adhere to the requirements imposed upon them by the Florida Rules of Professional Conduct.  Although all Rules are important and should be followed conscientiously, the Court particularly wishes to remind attorneys of the provisions in Rules 4-3.3 and 4-3.6.
6. Conduct of Parties: Attorneys shall caution their clients and witnesses against doing anything that might convey to the jury any feelings about the merit or truthfulness of the testimony, other evidence, or arguments being offered before the jury. Said conduct includes but is not limited to: making facial expressions; nodding the head; or making audible sounds. Naturally, attorneys shall be governed by the same restrictions.
7. Witnesses: It is imperative that counsel plan for their witnesses to fill the entire court day. It is counsel’s responsibility to advise the witness of any applicable orders in limine. Witness examination is limited to direct, cross, redirect and re-cross. Counsel should ask the Court prior to proceeding beyond re-cross. Counsel should not show or ask the witness to show anything to the jury unless it has been marked and admitted as an exhibit. The parties shall do all things reasonable and necessary to assure the availability of their witnesses for the entire trial period or otherwise preserve their testimony for trial as provided by the Florida Rules of Civil Procedure.
8. Equipment: Counsel should expect that they will have to bring their own materials to fill their equipment needs. The parties should arrange with the Bailiff when and how to set up their equipment in the Courtroom. While the Court’s Bailiff and Courtroom Clerk are exceedingly accommodating, the parties should not rely on or direct Court staff to set up or to work on trial equipment.
9. Continuances: The Court applies Florida Rule of General Practice and Administration 2.545(e) and Florida Rule of Civil Procedure 1.460 concerning continuances. Unless good cause is shown, all motions for continuance must be in writing, signed by the requesting party, contain a Certificate of Good Faith, and specify all efforts made to move the case and resolve discovery issues. Stipulations for continuance shall contain the same information as a motion for continuance and will be reviewed by the court on a case-by-case basis. Subject to the aforementioned, continuances requested within seven (7) days of trial will generally not be granted. Said policy includes requested continuances due to the unavailability of witnesses. Witnesses will be expected to be available when called.
10. Trial Schedule: Unless specifically noted otherwise by the Court, trial will be in session Monday-Friday, 8:30 A.M. (CT) through 12:00 P.M. (CT) and 1:30 P.M. (CT) 4:30 P.M. (CT).  At least one fifteen-minute break will occur in the morning and afternoon sessions.
11. Pretrial hearings: All hearings prior to the Pretrial Conference are subject to being heard by a Senior Judge or general magistrate appointed by this Court to hear such matters.
12. Settlement: All counsel shall immediately notify this Court in the event of settlement or dismissal and shall submit a stipulation for an order of dismissal. Counsel shall also notify the Court of any pending hearings that will be canceled as a result of the settlement by contacting the Court’s Judicial Assistant by email. A copy of the mediation report is not sufficient to remove the case from the docket.
13. Technology Needs: No later than **seven (7) days** prior to the Pretrial Conference, attorneys for all parties must notify the Court Technology Officer via email or telephone at hagang@jud14.flcourts.org or (850) 747-5410 as to any audio-visual equipment or other multi-media technology they intend to reserve for use at trial.
14. Sanctions: Failure to comply with the requirements of this Order shall subject counsel and parties to such sanctions as the Court shall determine just and proper under the circumstances, which sanctions may include, but are not limited to, contempt, dismissal, default, the striking of pleadings, claims or defenses, the exclusion of evidence or witnesses, the assessment of fees or costs, or such other sanctions as may be appropriate. Further, all pending dispositive, non-dispositive, and *Daubert*/expert-related motions and objections not filed, noticed, or heard in accordance with the deadlines and provisions set forth in this Order will be deemed moot and denied, and any objections overruled by entry of this Order. This Order shall supersede any other case management order which has been previously issued in this case and which conflicts directly herewith.
15. Court Reporting/Interpreters/Translators: Counsel for the parties shall meet and confer to discuss retention of a court reporter in advance of the trial and make appropriate scheduling arrangements so as to ensure the court reporter’s timely appearance. Furthermore, it is the responsibility of counsel to coordinate, retain, and pay for the services of an interpreter or translator as necessary to present their case. Trial will not be delayed due to the failure to make timely arrangements for a court reporter, interpreter, or translator to appear at the duly noticed time.

**DONE AND ORDERED** in Panama City, Bay County, Florida, on this DDDD.

JJJJ

Copies to:

CCCC

**"AMERICANS WITH DISABILITIES ACT"**

**If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance.  Please contact the ADA Coordinator by mail at Post Office Box 1089, Panama City, FL 32402 or by phone at (850) 767-3550 at least seven (7) days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven (7) days.  If you are hearing or voice impaired, please call 711.**

**IN THE CIRCUIT COURT OF THE**

**FOURTEENTH JUDICIAL CIRCUIT  
IN AND FOR BAY COUNTY, FLORIDA**

**CIVIL DIVISION**

**Case No: - CA**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,**

**Plaintiff(s),**

**vs.**

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**Defendant(s).**

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**JOINT PRETRIAL STIPULATION (JURY TRIAL)  
(*See* Order Setting Case for Trial for Additional Instructions)**

1. CONCISE FACTUAL STATEMENT OF THE NATURE OF THE ACTION: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

2. CONCISE STATEMENT OF FACTS WHICH ARE ADMITTED: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3. CONCISE STATEMENT OF THOSE ISSUES OR FACTS THAT REMAIN TO BE RESOLVED BY JURY: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

4. COMPLETE LIST OF WITNESSES (Each Party Attach Hereto):

5. COMPLETE LIST OF EXHIBITS (Each Party Attach Hereto) (Counsel shall confer prior to the conference and initial the ones agreed to being admitted into evidence):

6. LIST ANY OBJECTIONS TO SPECIFIC PORTIONS OF VIDEO DEPOSIITONS, TESTIMONY, OR VIDEO EXHIBITS: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

7. LIST OF ANY UNDISPOSED MATTERS REMAINING TO BE HEARD (Include Date of Filing Motion):

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

8. STIPULATIONS (checked):

1. Less than 6 jurors if one becomes incapacitated \_\_\_\_\_\_
2. Use of expert testimony anytime \_\_\_\_\_\_
3. Waive x-ray technicians \_\_\_\_\_\_
4. Waive records custodians \_\_\_\_\_\_
5. Waive photographers \_\_\_\_\_\_
6. Copies of ordinances or foreign laws \_\_\_\_\_\_
7. Other: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_

10. Each party shall anticipate having 1.5 hours for purposes of jury selection (3 hours total). Each party shall anticipate having 45 minutes for opening statements. Each party shall anticipate having 1 hour for closing argument. Please provide information as to why any additional time shall be needed or set aside: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

11. Instructions and verdict forms shall be submitted as set forth in this Court’s Uniform Order Setting Trial. Each instruction shall be on a separate sheet of paper. Counsel shall confer prior to trial as to any agreement they can reach on the instructions and verdict forms and advise the court.

12. The parties shall also submit a Pretrial Conference Checklist as required in the Court’s Uniform Order Setting Trial .

13. Failure to comply with the requirements of this Order will subject the party and/or counsel to appropriate sanctions.

**SIGNATURES:**

Attorney(s) for Plaintiff(s)

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_

Attorney(s) for Plaintiff(s)

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_

Attorney(s) for Defendant(s)

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_

Attorney(s) for Defendant(s)

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_

**PRETRIAL CONFERENCE CHECKLIST**

**JUDGE JAMES GOODMAN**

***(Pursuant to Fla. R. Civ. P. 1.200(d))***

**Bring (do not file) completed checklist to Pre-Trial Conference (“PTC”)**

CASE NO. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ PTC DATE: / / .

CASE STYLE \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,

Plaintiff(s)

vs.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,

Defendant(s)

**Estimated Length of Trial \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** Hours/Days **Jury Trial**:  Yes  No

Attorney(s) for Plaintiff(s)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (1)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (1)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (2)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (2)

Attorney(s) for Defendant(s)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (1)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (2)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (3)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (4)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (5)

1. Who will provide the **Court Reporter** (if any?)

Pltf. or Def. # \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Will the cost be shared/not shared? (circle one)

1. Is an **Interpreter** needed?  Yes  No

If yes, who will provide the **Interpreter**?

Pltf. or Def. # \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

If yes, will the cost be shared/not shared? (circle one)

1. Has the **Pretrial Meeting of Counsel** been completed?  Yes  No

If no, when is it scheduled? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Has the **Joint Pretrial Stipulation (“JPTS”)** been finished?  Yes  No

If not yet filed, it will be finished by: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

***Jury Trials Only***: Statement of the case to be read to venire:  Yes  No

***ATTACH A COPY HERETO FOR REFERENCE AT PTC***

|  |  |  |
| --- | --- | --- |
|  | Witness List Filed? | Exhibit List Filed? |
| Plaintiff (1): | Y / N | Y / N |
| Plaintiff (2): | Y / N | Y / N |
| Defendant (1): | Y / N | Y / N |
| Defendant (2): | Y / N | Y / N |
| Defendant (3): | Y / N | Y / N |
| Defendant (4): | Y / N | Y / N |
| Defendant (5): | Y / N | Y / N |

1. Are all **Exhibits** to be introduced and offered into evidence during trial pre-marked for identification with letters, or numbers for admission into evidence by stipulation, corresponding to the Exhibit List given to the Trial Clerk?

Plaintiff (1):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff (2):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (1):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (2):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (3):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (4):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (5):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Have all **Demonstrative Aids,** charts, boards, illustrations, maps, diagrams and PowerPoint slides or presentations (to be used during Opening Statement or Trial) been pre-marked for identification, exchanged or otherwise made available to opposing counsel to evaluate and review to allow for objections to be noted?

***NOTE: DEMONSTRATIVE AIDS MAY NOT BE USED DURING OPENING STATEMENT WITHOUT AGREEMENT OR PRIOR COURT ORDER.***

Plaintiff (1):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff (2):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (1):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (2):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (3):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (4):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (5):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Has **Mediation** been held?  Yes  No If no, when is it scheduled? \_\_\_\_\_\_\_\_\_\_\_\_\_\_
2. Have all **Deposition Transcripts, Answers to Interrogatories, and Responses to Request(s) for Admissions** been filed to the Court file if they are to be published during the case in chief or used for impeachment?

Plaintiff (1):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff (2):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (1):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (2):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (3):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (4):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Defendant (5):  Yes  No If no, when? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Have all **Stipulations, Admissions, Agreements** and **Waivers** been reduced to writing and incorporated in the Joint Pretrial Stipulation?  Yes  No If no, when will they be prepared and filed? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

***NOTE: STIPULATIONS, ADMISSIONS, AGREEMENTS AND WAIVERS MUST BE IN WRITING IF SEEKING COURT ENFORCEMENT.***

1. Has all **fact discovery** been completed?  Yes  No

If no, describe generally what **discovery** is pending and when it will be completed? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Has all **expert discovery** been completed?  Yes  No

If no, describe generally what **expert discovery** is pending and when it will be completed? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Have all ***Daubert*** or other **Expert Witness Related Motions** been filed and heard?

* Yes  No

If no, identify any such pending motion(s) and whether they were timely filed:

Timely Filed?

1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
5. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
6. Have all ***Northrup*** **Impeachment Materials** been identified, disclosed and exchanged?

 Yes  No If no, when will such materials be identified, disclosed and exchanged? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Have all **Dispositive Motions and Summary Judgment Motions** been filed and heard including but not limited to, the defense of “failure to state a cause of action” pursuant to Rule 1.140(h)(2)?

 Yes  No

If no, identify any such pending motion(s) and whether they were timely filed:

Timely Filed?

1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
4. Have all **Motions to Amend Pleadings** been filed and heard?  Yes  No

If no, identify any such pending motion(s) and whether they were timely filed:

Timely Filed?

1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
4. Have all case specific **Motion in *Limine*** been filed and heard?  Yes  No

If no, identify any such pending motion(s) and whether they were timely filed:

Timely Filed?

1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
5. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
6. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
7. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
8. Are there any **other** **pending motion(s), special provisions, accommodations, or concerns** not previously identified above?  Yes  No

If yes, identify any such **pending motion(s), special provisions, accommodations, or concerns:**

Timely Filed?

1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
5. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Y / N
6. Have all **Rule 1.360 Examinations** been completed?  Yes  No

If no, describe generally what examination(s) are pending and the anticipated completion date? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Have all **Deposition Designations**, **Counter Designations, objections and completeness concerns** been timely exchanged in writing?  Yes  No

If no, when will such **deposition designations, objections, and completeness concerns** be exchanged? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Will typed proposed **Jury Instructions** and **Verdict Forms** be filed with the Clerk and submitted to the Court in hard copy form at the Pre-Trial Conference?  Yes  No

If no, when will the **jury instructions** and **verdict forms** be filed with the Clerk and submitted to the Court? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. If Jury Trial, how many prospective **Jurors** are requested for the **Venire**? \_\_\_\_\_\_\_

Number of **Peremptory Challenges** for Plaintiff (1)? \_\_\_\_\_\_\_\_

Number of **Peremptory Challenges** for Plaintiff (2)? \_\_\_\_\_\_\_\_

Number of **Peremptory Challenges** for Defendant (1)? \_\_\_\_\_\_\_\_

Number of **Peremptory Challenges** for Defendant (2)? \_\_\_\_\_\_\_\_

Number of **Peremptory Challenges** for Defendant (3)? \_\_\_\_\_\_\_\_

Number of **Peremptory Challenges** for Defendant (4)? \_\_\_\_\_\_\_\_

Number of **Peremptory Challenges** for Defendant (5)? \_\_\_\_\_\_\_\_

Number of **Alternate Jurors** to be impaneled? \_\_\_\_\_\_\_\_

Number of **Peremptory Challenges** each party is entitled to in the selection of the Alternate Juror(s):

Plaintiff (1) \_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff (2) \_\_\_\_\_\_\_\_\_\_\_\_

Defendant (1) \_\_\_\_\_\_\_\_\_\_\_\_

Defendant (2) \_\_\_\_\_\_\_\_\_\_\_\_

Defendant (3) \_\_\_\_\_\_\_\_\_\_\_\_

Defendant (4) \_\_\_\_\_\_\_\_\_\_\_\_

Defendant (5) \_\_\_\_\_\_\_\_\_\_\_\_

1. Are there any objections or concerns to **Jurors** taking **notes** and asking **questions** of witnesses (See Section 40.50, Florida Statutes and Rule 1.452, Fl. R. Civ. Pr.)?

* Yes  No

1. Time Estimates:

|  |  |  |  |
| --- | --- | --- | --- |
| **Time Estimates** | ***Voir Dire***  **(If Jury Trial)** | **Opening Statement** | **Closing Argument** |
| Plaintiff (1) | min/hr. | min/hr. | min/hr. |
| Plaintiff (2) | min.hr. | min/hr. | min/hr. |
| Defendant (1) | min/hr. | min/hr. | min/hr. |
| Defendant (2) | min/hr. | min/hr. | min/hr. |
| Defendant (3) | min/hr. | min/hr. | min/hr. |
| Defendant (4) | min/hr. | min/hr. | min/hr. |
| Defendant (5) | min/hr. | min/hr. | min/hr. |

1. When is the **Rule of Sequestration** invoked?

 Before *voir dire*  Before opening  Not invoked

1. Are there any pending written **Request(s) for Judicial Notice** with timely notice to adverse parties, proof of which is filed with the Court?  Yes  No

If yes, identify any such pending Request(s):

1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

***NOTE: ANY PARTY REQUESTING JUDICIAL NOTICE MUST FOLLOW THE EVIDENCE CODE, Section 90.201-90.207, Florida Statutes.***

1. Do the Parties understand that the Court expects them to **disclose** the next day’s **witnesses** at the end of each court day?  Yes  No
2. **Trial Briefs** are not required, however, do the parties understand that if you choose to submit them, courtesy hard copies must be delivered to Judge Goodman’s chambers at least **three (3) business days** before trial to allow adequate time for review?  Yes  No

**By our signatures below, we have read and acknowledge the foregoing and understand duties, responsibilities and obligations related to preparing for and conducting the trial of the above-styled cause. We understand that we must notify the Court immediately upon settlement of the case.**

Signatures:

Attorney(s) for Plaintiff(s)

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(1)

Printed Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(2)

Printed Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorney(s) for Defendant(s)

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(1)

Printed Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(2)

Printed Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(3)

Printed Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_