

IN THE CIRCUIT COURT OF \_\_\_\_\_ COUNTY, MISSISSIPPI

PLAINTIFF

vs.

CAUSE NO.

DEFENDANT

PRE-TRIAL STATEMENT PURSUANT TO COURT ORDER

The above case appearing to be ready for trial, and the undersigned Circuit Judge having dispenses with formal pre-trial conference and entered an Order requiring that the parties submit the following pre-trial statement.

1. Counsel with full authority to speak for the parties in the cause have entered into this pre-trial statement which is binding on the parties.

2. In the pre-trial statement, counsel represent to the Court:

- a. They have stipulated all relevant and material facts not genuinely at issue.
- b. All information contained herein was prepared by counsel after preparation with the same thoroughness as for trial in order to conserve the time of counsel and the Court.

\* \* \* \* \*

3. The following claims (including claims stated in the complaint and counter-claims, if any) have been filed:

\* \* \* \* \*

4. There is the following jurisdictional and/or venue question: (If there are none, write in "None").

\* \* \* \* \*

5. There are pending motions as follows: (If there are none, write in "None").

\* \* \* \* \*

6. The following is a concise summary of the ultimate facts as claimed by:

a. Plaintiff:

\* \* \* \* \*

b. Defendant:

\* \* \* \* \*

7. The following facts are established by the pleadings or by stipulation or admission.

\* \* \* \* \*

8. The contested issues of fact are as follows:

\* \* \* \* \*

9. The contested issues of law are as follows:  
(MEMO BRIEFS SHALL BE ATTACHED)

\* \* \* \* \*

10. The following is a list and brief description of all exhibits (except documents to be used for impeachment only) to be offered in evidence by the respective parties. Each exhibit has been marked for identification and examined by all counsel.

A. TO BE OFFERED BY THE PLAINTIFF:

\* \* \* \* \*

The authenticity and admissibility in evidence of these exhibits has been stipulated. If the authenticity and/or admissibility of any exhibit is objected to, the exhibit must be identified in the following space, together with a statement of the specific ground or grounds for the objection.

\* \* \* \* \*

B. TO BE OFFERED BY THE DEFENDANT:

\* \* \* \* \*

The authenticity and admissibility in evidence of these exhibits has been stipulated. If the authenticity and/or admissibility of any exhibit is objected to, the exhibit must be identified in the following space, together with a statement of the specific ground or grounds for the objection.

\* \* \* \* \*

11. The following is a list and brief description of any charts, graphs, models, schematic diagrams, and similar objects which will be used in opening statements or closing arguments, but which will not be offered in evidence.

\* \* \* \* \*

With respect to the items listed above, objections are made to their use as follows:

\* \* \* \* \*

If any other objects are to be used by any party, they will be submitted to opposing counsel at least three days prior to trial. If there is then any objection to their use, the dispute will be submitted to the Court at least one day prior to trial.

12. The following is a list of expert witnesses Plaintiff anticipates calling at trial (excluding witnesses used solely for impeachment).

<u>NAME</u>	<u>BUSINESS ADDRESS AND TELEPHONE</u>	<u>RESIDENCE ADDRESS AND TELEPHONE</u>
-------------	---	--

\* \* \* \* \*

The qualifications of the above listed expert witnesses are admitted by Defendant except as follows:

\* \* \* \* \*

The following is a list of expert witnesses Defendant anticipates calling at trial

(excluding witnesses used solely for impeachment).

<u>NAME</u>	<u>BUSINESS ADDRESS AND TELEPHONE</u>	<u>RESIDENCE ADDRESS AND TELEPHONE</u>
-------------	---	--

*	*	*	*	*	*	*	*	*	*	*
---	---	---	---	---	---	---	---	---	---	---

The qualifications of the above listed expert witnesses are admitted by Plaintiff except as follows:

*	*	*	*	*	*	*	*	*	*	*
---	---	---	---	---	---	---	---	---	---	---

13. Counsel suggest the following additional matters and/or preliminary hearings to aid in disposition of the action:

*	*	*	*	*	*	*	*	*	*	*
---	---	---	---	---	---	---	---	---	---	---

14. Counsel estimate the length of the trial will be \_\_\_\_\_ days.

Submitted, this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

ATTORNEY FOR PLAINTIFF

ATTORNEY FOR DEFENDANT

Approved for filing this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

CIRCUIT COURT JUDGE