

HON. DEBORAH H. KARALUNAS FORM LETTER

Final pre-trial letter addressed to all counsel following Preliminary Conference

The trial in this matter is scheduled to begin on _____. A final pre-trial conference is scheduled for _____ (approximately 10 days before the trial). The pre-trial conference is to be attended by counsel and the parties, all of whom are expected to be fully prepared to discuss the settlement of this matter.

Prior to the pre-trial conference, counsel for the parties shall pre-mark their exhibits and consult in good faith to agree upon the exhibits that will be offered into evidence without objection. Exhibits not previously demanded which are to be used solely for credibility or rebuttal need not be pre-marked. In addition, counsel for the parties shall exchange a list of the deposition testimony that will be offered into evidence and consult in good faith to agree upon the portions of deposition testimony that will be offered into evidence without objection.

On or before _____ (five days before the final pre-trial conference), each party shall file with the Court and serve on opposing counsel:

- 1) any motions in limine;
- 2) a brief pre-trial memoranda (no more than two (2) pages in length);
- 3) an indexed binder of trial exhibits. Plaintiff's exhibits shall be marked with numbers and defendant's exhibits shall be marked with letters. The exhibit binder shall include a list identifying the exhibits upon which agreement has been reached and a separate list identifying all disputed exhibits;
- 4) an indexed binder of all deposition testimony to be introduced at trial. The binder shall include pertinent portions of the transcripts, a list identifying all deposition testimony upon which agreement has been reached, and a separate list identifying all deposition testimony to which objection is made including the basis for objection;
- 5) proposed jury charges including citations to the PJI or applicable case law;
- 6) a proposed jury verdict sheet; and
- 7) a list of witnesses including the estimated length of each witness's testimony.

Your cooperation in this matter is appreciated.

Very truly yours,

Deborah H. Karalunas, J.S.C.