

RULE NCV-212.2. PRE-TRIAL MEMORANDUM FORM
NORTHUMBERLAND COUNTY
PRE-TRIAL MEMORANDUM
CIVIL CASES

NOTE: The memorandum is to be submitted to the Court and to each party at least 5 (five) days prior to the time of the scheduled pre-trial conference.

(CAPTION)

CASE NO. _____

NAME OF PARTY _____

NAME OF ATTORNEY _____

DATE & TIME OF PRE-TRIAL _____

1. List all parties and counsel to action.
2. A summarized version of facts.
3. Legal theory of liability – list those theories upon which you will rely, each party may be limited to those theories at trial.
4. If there is a counterclaim, set forth the theory of liability.
5. Damages – give detailed description and itemized statement of damages.
6. Names of witnesses:
 - (a) Definite witnesses and scope of testimony (liability, damages or both).
 - (b) Possible witnesses and scope of testimony (liability, damages or both).
7. Expert witnesses – state expected scope of testimony.
8. Exhibits – list all exhibits and indicate whether or not they have been shown to opposing counsel. Each party may be limited to the use of the listed exhibits at trial.
9. Scheduling – list any unusual scheduling problems which are anticipated. Civil trials are held in February, June, September, and December.
10. Requested stipulations (qualification of experts, admissibility of documents, special damages, etc.)
11. Unusual legal issues – issues on which trial briefs should be required.
12. Has there been a timely demand for a jury trial? Yes _____ No _____
13. Estimated time to try the case.
14. Outstanding motions.
15. Settlement – your lowest demand or highest offer \$_____.
(party must be available in person or by phone at the time of pre-trial conference for purpose of settlement discussions).
16. Miscellaneous – list any matter which you feel is important but which hasn't been covered.
17. Pre-trial orders requested.

Respectfully submitted:

Counsel for: _____