

Form of Joint Pretrial Statement To Be Served, Filed and Provided To Assigned Judge Before Pretrial Conference Pursuant to Rule 16(e)

_____)	
Plaintiff,)	2010 CA 00XXXX 'Extender'
)	Judge_____
v.)	Pretrial Date_____Time____
)	Trial Date_____Time____
_____)	(Jury) (Nonjury)
Defendant.)	

JOINT PRETRIAL STATEMENT

- A. Certification of Rule 16(c) Meeting:** State date, time and place of the meeting required to be held before pretrial to prepare joint statement and persons who attended.
- B. Parties and Counsel:** Names, addresses, and telephone numbers of all parties and counsel on whose behalf this statement is filed.
- C. Nature of the Case:** A brief mutually agreed upon, non-argumentative, neutral statement of the case suitable for reading to a jury as part of voir dire.
- D. Claims and Defenses:** Each party to set forth a concise statement of all claims and defenses, separately numbered, which that party is submitting for trial.
- E. Undisputed Issues/Stipulations:** List all issues not in dispute or facts stipulated.
- F. Disputed Issues:** List each disputed issue with the parties' principal contentions.
- G. Requested Stipulations:** List all facts to which other parties are asked to stipulate.
- H. Relief Sought:** Specify nature and amount of each item of damage claimed or description of equitable relief sought by each party.
- I. Citations:** List any cases or statutes which need to be called to the court's attention. Attach copies of any not found in D.C. Code, A.2d, or U.S. App. D.C., and include copies of any DCMR relied upon.
- J. Pending Motions:** List title, movant, and filing date of all pending motions.
- K. Witnesses:** Name, **address**, and telephone number of each person who may be called to testify. As to experts, list briefly matters about which each expert will testify. **Per Rule 16(e), no party may call at trial any witness omitted from that party's pretrial statement, except for impeachment or rebuttal purposes.**

L. Exhibits: Attach a completed Exhibit Summary Form (obtainable from Clerk's Office) listing-- by exhibit number and description -- each exhibit to be offered at trial. Any objections to another party's exhibits should be stated. Copies of such exhibits must be served on all other parties before pretrial. No exhibit shall be received at trial (except for impeachment) unless it was so listed and served, and exhibits so listed and served may be admitted at trial unless objection thereto is made before the pretrial **per Rule 16(e)**. Original exhibits must be brought to pretrial for viewing; any party proposing to offer more than 15 exhibits must arrange them as described in Rule 16(f).

M. Depositions: Designate by page and line deposition testimony to be offered as substantive evidence.

N. Pleadings and Discovery Responses: Designate by page and paragraph of any pleading or discovery response to be offered as substantive evidence.

O. Demonstrative or Physical Evidence: Describe any blow-ups, models, samples, objects, etc., to be used at trial.

P. Videotapes: Identify any non-impeachment videotapes to be shown to the jury.

Q. Requested Voir Dire Questions: Identify questions agreed upon and those not agreed upon. Separate, duplicative lists of questions are unacceptable.

R. List of Standard Jury Instructions Requested: Identify instructions agreed upon and those not agreed upon.

S. Non-Standard Jury Instructions: Supply complete text of each instruction on a separate page. Authorities should appear separately from the text of the instruction.

T. Verdict Form: Full text of verdict form to be submitted to the jury.

U. Settlement: Minimum demand; maximum offer. [To be provided in all cases except non-jury trials.]

V. Estimated Length of Trial: _____ days.

"The foregoing Joint Pretrial Statement, as revised at the pretrial conference in the presence of the parties and counsel, shall stand as the pretrial order in this case."

Signatures