

RULE 135. JOINT FINAL PRETRIAL STATEMENT

(a) Conference of Parties. By a date established by the court, all parties shall confer for the purpose of discussing, agreeing upon, preparing, signing and filing a joint final pretrial statement in conformity with the requirements of this Rule. The filing of the joint final pretrial statement constitutes a representation to the court by all of the parties that they or their representatives at the meeting were fully vested to discuss and agree upon all of the matters set forth in Rule 135(b); they have in fact discussed and attempted in good faith to reach agreement on each of those matters; and the case is ready for trial.

(b) Joint Final Pretrial Statement. The joint final pretrial statement shall include the following, which will be considered by the court at the pretrial conference and may be incorporated into a pretrial order issued by the court:

- (1) stipulated facts;
- (2) all factual issues in dispute;
- (3) all legal issues;
- (4) all issues regarding the use of information or materials designated as confidential;
- (5) each party's list of exhibits;
- (6) each party's list of witnesses;
- (7) each party's list of experts;
- (8) depositions, or portions thereof, to be used in lieu of live testimony;
- (9) estimated length of trial;
- (10) subject matter of potential motions in limine;

- (11) proposed voir dire questions;
- (12) proposed jury instructions; and
- (13) proposed verdict form.

(c) **Deadline for Filing Joint Final Pretrial Statement.** The parties shall file the joint final pretrial statement by a date established by the court. The plaintiff shall have primary responsibility for coordinating the meeting between the parties and filing the joint final pretrial statement and related material. If the plaintiff is unable to timely comply with this requirement, plaintiff shall notify the court in writing of the reasons therefor and request a status conference.