IN THE CIRCUIT COURT, FOURTH JUDICIAL CIRCUIT, IN AND FOR

CLAY COUNTY, FLORIDA

CASE NO.:

DIVISION: A

Plaintiffs,

vs.

Defendants,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**JOINT PRETRIAL STIPULATION**

 Pursuant to this Court’s order setting this case for pretrial conference and trial, counsel for the parties met and stipulated as follows:

1. **Appearances**:

 A. Trial counsel for Plaintiff:

 B. Trial counsel for Defendant:

2. **Statement of the Case**. Concise factual statement of the nature of the action, which shall include the date and place of accrual, identity of parties as they relate to the action and a brief general statement of each party's case or contention. The statement shall be in such form and contain such necessary information of the claims to be tried, including any counter-claims, cross-claims, or third party claims:

3. **Statement of Admitted Facts**. Concise statement of those facts which are admitted and will require no proof at trial:

4. **Abandoned Issues.**

5. **Issues to be Tried.** Concise statement of those issues of fact which remain to be litigated:

6. **Significant Issues of Law, Procedure or Evidence.**

7. **Proposed Amendments.** Any proposed amendments to the pleadings:

8. **Exhibit Lists.**

 Plaintiff’s exhibit list is attached as Exhibit A.

 Defendant’s exhibit list is attached as Exhibit B.

9. **Witness List.** Complete list of witnesses including anticipated impeachment witnesses, specifying the name and address of each from whom testimony may be presented at trial:

 Plaintiff’s witness list is attached as Exhibit C.

 Defendant’s witness list is attached as Exhibit D.

10. **Expert Witness List.** List of all expert witnesses and the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion:

 Plaintiff’s witness list is attached as Exhibit E.

 Defendant’s witness list is attached as Exhibit F.

11. **Objections.** Statement reflecting objections to specific portions of video depositions, testimony, or video exhibits which may be offered in evidence at trial:

12. **Pending Matters.** List of all undisposed matters to be heard at the Pretrial Conference:

13. **Other Agreed Matters.**

14. **Attorney fees** sought by:

 A. \_\_\_\_\_ Plaintiff \_\_\_\_\_ Defendant

 B. \_\_\_\_\_ Issue to be reserved for consideration subsequent to trial or final hearing.

 C. \_\_\_\_\_ Issue to be heard at trial or final hearing by affidavit or

 by testimony

NOTE: All parties seeking attorney's fees at the time of trial or final hearing or subsequent thereto must file verified statements as to the manner and time spent, along with a detailed list of costs.

15. Estimated time needed for trial or final hearing \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

16. Discovery: To be completed on or before \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

DATED this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorney for Plaintiff(s) Attorney for Defendant(s)

Florida Bar No. Florida Bar No.

Email: Email: