

**IN THE CIRCUIT COURT, FOURTH JUDICIAL  
CIRCUIT, IN AND FOR DUVAL COUNTY, FLORIDA**

**CASE NO.: 16-\_\_\_\_-DR-\_\_\_\_-FMXX  
DIVISION: FM-A**

**In re:**

\_\_\_\_\_ ,

Husband    Father    Other: \_\_\_\_\_

**and**

\_\_\_\_\_ ,

Wife       Mother    Other: \_\_\_\_\_

\_\_\_\_\_ /

**PRETRIAL STIPULATION**

*(Use this form when each party has an attorney)*

Counsel for the parties stipulate to the following:

**1. Type of Proceeding:**

- Dissolution of marriage
- Modification of dissolution of marriage
- Paternity
- Contested adoption
- Temporary custody by extended family member
- Other: \_\_\_\_\_

**2. In DOM case, dates: (a) of marriage: \_\_\_\_\_ (b) of separation: \_\_\_\_\_**

**3. Names, ages, and dates of birth of any children who were born to the parties or who were born or conceived by the Wife during a marriage or who are otherwise at issue:**

Children			
Name of child	Gender	Age	Date of birth

4. **Current residence of any children:**

- With Wife or Mother
- With Husband or Father
- Other (specify): \_\_\_\_\_

5. **Parental responsibility and parenting skills course:**

- Parents agree to shared parental responsibility.
- Sole parental responsibility is sought by the  Wife  Husband  
 Mother  Father  Other: \_\_\_\_\_  
as to:  all issues  the following issue(s): \_\_\_\_\_
- Parenting skills course completed by:  Wife  Husband  Both  Neither

6. **Timesharing / Parenting Plan:**

- The parties have agreed to a proposed Parenting Plan which includes a proposed timesharing arrangement. The proposed plan is attached to this stipulation. This proposed plan:
  - does not include supervised timesharing for either parent.
  - includes supervised timesharing for the \_\_\_\_\_.
- The parties have been unable to agree to a proposed Parenting Plan or timesharing arrangement. Each party's proposed plan is attached to this stipulation.

Neither party's plan proposes supervised timesharing for the other parent.

The plan proposed by the \_\_\_\_\_ includes supervised timesharing for the other parent.

7. **Employment:**

(a) The Husband or Father is employed by \_\_\_\_\_ and earns \$ \_\_\_\_\_ in gross income/mo. and \$ \_\_\_\_\_ in net income/mo.

(b) The Wife or Mother is employed by \_\_\_\_\_ and earns \$ \_\_\_\_\_ in gross income/mo. , and \$ \_\_\_\_\_ in net income/mo.

8. **Retirement and deferred compensation plans (dissolution cases only):**

(a) The Husband participates in or receives benefits from the following retirement and deferred compensation plans, including, but not limited to, traditional pension plans (civilian and military), 403(b) plans, 457 plans, 401(k) plans, IRAs, SEP-IRAs:

\_\_\_\_\_

(b) The Wife participates in or receives benefits from the following retirement and deferred compensation plans, including, but not limited to, traditional pension plans (civilian and military), 403(b) plans, 457 plans, 401(k) plans, IRAs, SEP-IRAs:

\_\_\_\_\_

9. **Child support:**

A. Temporary support in amount of \$ \_\_\_\_\_ per \_\_\_\_\_, paid by \_\_\_\_\_  voluntarily or  by court order dated \_\_\_\_\_

B.  Cost of monthly health insurance premium for children's coverage: \$ \_\_\_\_\_

Parties disagree as to cost of premium.

C.  75% of monthly daycare = \$ \_\_\_\_\_

Parties disagree as to amount equal to 75% of monthly daycare.

D. Guidelines child support payable by:

The parties agree regarding the dollar amount of guidelines child support, and a single guidelines worksheet reflecting their agreement is attached to this stipulation.

The parties do not agree regarding the dollar amount of guidelines child support, and each party has attached a guidelines worksheet reflecting his or her calculation.

E. Medical/dental insurance premium to be paid by:  
 Husband/Father  Wife/Mother  Other \_\_\_\_\_  Disputed

F. Cost of uncovered medical/dental expenses for children to be:

Shared equally by parties

Paid 100% by: \_\_\_\_\_ Husband or Father \_\_\_\_\_ Wife or Mother

Paid *pro rata*: \_\_\_\_\_ % by Husband or Father and \_\_\_\_\_ % by Wife or Mother

Responsibility disputed

G. Deviation from guidelines child support sought by:

Husband or Father

Wife or Mother

Percentage deviation sought: \_\_\_\_\_ %  Upward  Downward

Basis for requested deviation: \_\_\_\_\_

#### 10. Life insurance

Sought by:  Husband or Father  Wife or Mother to secure  child support  alimony  both child support and alimony.

Parties agree as follows: Life insurance to be provided by \_\_\_\_\_ in amount of \$ \_\_\_\_\_ to secure:  child support  alimony  both.

#### 11. Alimony (dissolution of marriage cases only):

Neither party seeks alimony in any form.

The  Husband  Wife seeks (check all that apply):

\_\_\_\_\_ permanent periodic alimony in the amount of \$ \_\_\_\_\_ per month

\_\_\_\_\_ rehabilitative alimony in the amount of \$ \_\_\_\_\_ per month for \_\_\_\_\_ months or

\_\_\_\_\_ years

\_\_\_\_\_ lump sum alimony in the amount of \$ \_\_\_\_\_

\_\_\_\_\_ bridge-the-gap alimony in the amount of \$ \_\_\_\_\_

#### 12. Real property (dissolution of marriage cases only):

- A. The marital home is located at \_\_\_\_\_  
 and its fair market value is:  stipulated to be \$ \_\_\_\_\_  
 disputed. The legal description is attached on a separate sheet.
- B. Mortgage(s) encumbering marital home: List balances and to whom or to which  
 institution owed: \_\_\_\_\_
- C. The home is currently occupied by (check all that apply):  
 Husband  Wife  Child(ren)
- D. Special equity in marital home claimed by:  neither party  Husband  Wife
- E. Do the parties own marital real property other than the marital home?  
 Yes  No

If so, attach a separate sheet with the address, agreed fair market value (or, if not agreed, each party's asserted fair market value), and legal description of each such parcel of real property.

- F. Does either party own non-marital real property?  Yes  No

If so, attach a separate sheet with the address, fair market value and legal description of each such parcel of real property.

**13. Personal property (dissolution of marriage cases only):**

- A. The parties:  have  have not resolved all issues of personal property.
- B. *If any issues of significant personal property remain, the parties shall submit to the Court a list of all such disputed property in charts in the following formats. Additional pages of blank charts may be obtained from the judicial assistant.*

Assets Parties Agree are Marital				
Asset	Fair market value per Wife	Date of valuation	Fair market value per Husband	Date of valuation

<b>Assets Parties Agree are Non-Marital</b>					
<b>Asset</b>	<b>Owned by H/W ?</b>	<b>Fair market value per Wife</b>	<b>Date of valuation</b>	<b>Fair market value per Husband</b>	<b>Date of valuation</b>

<b>Assets Regarding Which Parties Disagree as to Marital / Non-Marital Character</b>				
<b>Asset</b>	<b>Fair market value per Wife</b>	<b>Date of valuation</b>	<b>Fair market value per Husband</b>	<b>Date of valuation</b>

<b>Debts Parties Agree are Marital</b>		
<b>Debt</b>	<b>Amount</b>	<b>Date of valuation</b>

<b>Debts Parties Agree are Non-Marital</b>			
<b>Debt</b>	<b>Amount</b>	<b>Date of valuation</b>	<b>To be paid by H or W ?</b>

Debts Parties Agree are Non-Marital			
Debt	Amount	Date of valuation	To be paid by H or W ?

Debts Regarding Which Parties Disagree as to Marital / Non-Marital Character		
Debt	Amount	Date of valuation

14. **Witnesses and nature of testimony (list below or attach):**

Husband or Father: \_\_\_\_\_  
 Wife or Mother: \_\_\_\_\_

15. **Exhibits (list below or attach):**

Husband or Father: \_\_\_\_\_  
 Wife or Mother: \_\_\_\_\_

Each party has filed an **UP-TO-DATE** financial affidavit and those  are  are not stipulated into evidence.

16. **Attorney's fees / costs**

Sought by:  Husband or Father  Wife or Mother  Both

To be heard at trial:

Only *entitlement* to fees and costs  Both *entitlement* to, and *amount* of, fees and costs  
 Jurisdiction to be retained for later hearing on :  Entitlement  Amount  Both

Any testimony offered in support of a claim for attorney's fees may be supported by live testimony:  only  or by affidavit.

17. **Other issues:** \_\_\_\_\_

18. **Additional stipulations:** \_\_\_\_\_

19. **Discovery:**

is closed as of the date of the pretrial conference

remains open until \_\_\_\_\_ for:

any discovery

the following specified discovery: \_\_\_\_\_

20. **Time needed for trial:** \_\_\_\_ days \_\_\_\_ hours

Signature block:

	<b>Attorney for Wife / Mother</b>	<b>Attorney for Husband/Father</b>	<b>Attorney for Other</b>
Signature			
Printed name			
Address			
Phone number			
Florida Bar number			
Date of signature			