

PRETRIAL CATALOGUE

A. THE MARRIAGE

- (1) Date and place of marriage
- (2) Date of separation
- (3) A concise statement of the marital history

B. THE CHILDREN

- (1) A list of the names and ages of the children
- (2) A statement in compliance with Section 61.522, Florida Statutes, unless already filed.
- (3) A statement concerning which party presently has custody of the children
- (4) A statement of whether the children are presently covered under any medical and/or dental insurance policy
- (5) A statement of any special medical problems of any of the children

C. CHILD CUSTODY

In all cases where child custody, visitation and/or child support are in issue a statement of the client's claims or defenses, together with the factual and legal basis therefor

D. CHILD SUPPORT

- (1) The attorney/pro se litigants are required to provide a completed CHILD SUPPORT GUIDELINE WORKSHEET in support of his or her position regarding child support
- (2) A statement of the amount of child support proposed
- (3) A statement setting forth the specific factual and legal basis in support of the party's claim and/or defense for child support

E. ALIMONY – SPECIAL RELIEF

In all cases where either party seeks alimony or other special relief a STATEMENT OF CLIENT'S CLAIM for alimony and/or special relief is required and shall state the nature of alimony claimed, whether lump sum, rehabilitative or permanent, together with the factual and legal basis therefor

F. WITNESS LIST

The Pretrial Catalogue shall contain a list of witnesses to be called at trial. This includes rebuttal and impeachment witnesses who, in the exercise of diligent pretrial preparation, you should know might be called. Expert witnesses shall be so specified. Such list shall contain names, addresses and a brief statement of testimony to be offered. Witnesses not listed will not be called at trial except for good cause shown.

G. EXPERT WITNESSES

ONLY ONE (1) EXPERT, PER SPECIALTY, PER SIDE, is permitted unless otherwise ordered by the Court.

H. EXHIBIT LIST

The Pretrial Catalogue shall contain a list of all exhibits which may be used at trial. Each exhibit must be shown to and initialed by the opposing attorney/pro se litigant at least ten (10) days before trial. Exhibits not specifically listed and initialed may not be used at trial except for good cause shown.

If the attorneys/pro se litigants fail to coordinate the review of exhibits prior to trial, said failure will be taken into account by the Court. At docket sounding inquire whether you need to meet with the clerk to PRE-MARK EXHIBITS.

EXHIBIT "A"

I. DIVISION OF ASSETS

In all cases in which there is a disputed question as to division of any assets, real or personal, concurrently with the Pretrial Catalogue each party shall file a SCHEDULE OF ASSETS, in affidavit form, signed and sworn to by the party, setting forth each asset to which a disputed question exists or to the division thereof. Said Schedule shall reflect

- (1) A description of the asset and non-marital assets (so identified)
- (2) In whose name the title or ownership lies
- (3) The date of acquisition
- (4) The value at the time of acquisition
- (5) The value at time of filing of petition or, if another date is used, explain why another date is used
- (6) The present value thereof
- (7) The basis for any claim of special equity thereto
- (8) The basis of allowance of (or any portion thereof) EQUITABLE DISTRIBUTION
- (9) A list of suggested disposition of each asset

J. DIVISION OF DEBTS

In all cases in which there is a disputed question as to division of any debts, concurrently with the Pretrial Catalogue each party shall file a SCHEDULE OF DEBTS, in affidavit form, signed and sworn to by the party, setting forth each debt to which a disputed question exists or to the division thereof. Said Schedule shall reflect

- (1) A description of the marital debts and non-marital debts
- (2) In whose name the debt is in
- (3) The date debt was incurred
- (4) The amount of the debt when it was first incurred
- (5) The amount of the debt at the time of filing of petition, of if another date is used, explain why another date is used
- (6) The present amount of the debt
- (7) A list containing a suggested disposition of each debt and the basis for the suggested disposition

K. A SUMMARY OF ANY UNIQUE AREAS OF LAW OR FACTS TO BE ASSERTED

L. STIPULATION

The attorneys/pro se litigants shall review testimony and stipulate to the admissibility, where appropriate, of all records and testimony which can be read into the record at final hearing. A list of Admissions and Stipulation is to be included in the Pretrial Catalogue.

M. FINANCIAL AFFIDAVIT

A current, fully executed financial statement in accordance with Form 12.901(d) or (e) of the Florida Family Law Rules of Procedure shall be attached to the Pretrial Catalogue and exchanged with the attorneys/pro se litigants

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