

PRE-TRIAL STIPULATION

1. Each party shall NO LATER THAN SEVEN (7) DAYS PRIOR TO TRIAL SCHEDULED, file with the Clerk of the Circuit Court, serve opposing counsel and serve the Judge before whom the above-styled case is scheduled for trial, a Pre-Trial Stipulation setting forth the following:

(a) **The Marriage:**

1. Date and place of marriage
2. Date of separation
3. Is marriage counseling or cooling off period requested by either party?

(b) **The Children:**

1. Names and ages of the children involved.
2. The party who presently is the primary residential custodian.
3. The amount of child support proposed for the children based upon completed guideline worksheets.
4. The amount of childcare, after school care or summer care expenses requested for the children.
5. Whether or not the children are presently covered by any medical insurance policy and the cost if any.
6. What, if any, special medical problems do any of the children have.
7. **A Proposed custody and visitation schedule by each party on one separate page.**
8. Has a custody investigation or is a custody investigation being requested by either parent.

(c) **Alimony:**

1. Amount of Alimony, if any, proposed by each party.
2. The nature of the alimony, i.e. permanent, rehabilitative, lump sum or combination of same.
3. A rehabilitative plan is required where rehabilitative alimony is proposed.

(d) **Exhibits:**

A schedule of all exhibits and documentary evidence which may be used at trial.

(e) **Witnesses:**

1. A complete list of all witnesses who may be called at trial.
2. The specific total time needed by both parties for examination of each witness shall be set forth when a trial is noticed for more than one day.

(f) **Assets and Liabilities:**

A list of all assets and liabilities legally or equitably owned by the parties as of the date of this Stipulation, which should be designated as to whether they are marital or non-marital and whose value should also be listed. **A proposed asset and liability distribution by each party on one separate page.**

- (g) Awards: A list of all awards requested by each party.
- (h) Agreed upon factual contentions:
Any and all factual contentions agreed upon by the parties.
- (i) Legal Issues:
Any and all legal issues which remain to be decided by the Court.
- (j) Attorney's fees and Court costs:
1. The amount of the attorney's fees and court costs sought by either party from the other (estimate to conclusion of trial).
2. Will testimony be offered on this issue at trial or at a subsequent hearing?
- (k) Miscellaneous:
1. Requests for amendments to the pleadings.
2. Necessity for further discovery.
3. List of pending motions.
4. Request for judicial notice.

TERMINATION OF DISCOVERY

6. Discovery shall cease as of five (5) days prior to the trial scheduled pursuant to this order unless by agreement of the parties.

EXCHANGE OF EXHIBITS

7. Counsel for the parties shall exchange all proposed exhibits no later than five (5) days prior to the trial scheduled pursuant to this Order. All exhibits by the parties for use at trial should be marked for identification BEFORE the trial. All composite exhibits shall be satisfactorily bound to avoid the loss and disintegration of component parts or pages before presentation in Court.

MEMORANDUMS OF LAW

8. Memorandums of law if they are to be submitted by the parties, should be submitted to the Court three (3) working days prior to the trial scheduled pursuant to this Order. Ideally they should be submitted with the Pre-Trial Stipulation.