

PRETRIAL CATALOGUE – POST JUDGMENT

A. PROCEDURAL HISTORY

- (1) Date of Final Judgment that is the subject of this post-judgment proceeding
- (2) Date of filing of Petition for Modification
- (3) Grounds for modification

“B,” “C,” AND “D” APPLY ONLY IF CHILDREN ARE AT ISSUE IN MODIFICATION PROCEEDING.

B. THE CHILDREN

- (1) A list of the names and ages of the children
- (2) A statement in compliance with Section 61.132, Florida Statutes
- (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. 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.

F. EXPERT WITNESSES

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

G. 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.

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

I. 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.

J. 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.