

CHECKLIST FOR SEQUENTIAL ACTIVITIES
TO ORGANIZE AUTOMOBILE ACTION

_____ vs. _____

PRETRIAL

- ☐ Statute of limitation diaried
- ☐ Representation contract signed
- ☐ Medical authorization signed
- ☐ Thank you letter to referral source
- ☐ Authorization for Personnel file signed
- ☐ Letter to defendant and defendant insurance carrier informing them of your representation
- ☐ Special notice to public entity if necessary
- ☐ I. R. S. Authorization signed
- ☐ Initial client information sheet completed
- ☐ Client information sheet completed
- ☐ Client recorded statement taken
- ☐ Client's insurance information obtained
- ☐ Request for defendant's insurance information mailed
- ☐ Accident report obtained
- ☐ Disposition of any traffic citations
- ☐ Any testimony on traffic citations
- ☐ Defendant's statement, if possible
- ☐ Corporation information obtained, if defendant was a corporation
- ☐ Write Department of Motor Vehicles re: ownership of defendant's vehicle
- ☐ First settlement demand
- ☐ Letters written for medical information
- ☐ Defendant's driving record sent for
- ☐ Case development plan in file
- ☐ All accident pictures obtained
- ☐ Pictures of scene
- ☐ Pictures of plaintiff
- ☐ Engineer's drawing
- ☐ Witness statements
- ☐ Consider day-in-the-life videotape
- ☐ Complaint prepared
- ☐ Request to produce
- ☐ Interrogatories to the defendant
- ☐ Defendant's deposition set and taken
- ☐ Motion and order for partial summary judgment
- ☐ Motion and order for summary judgment
- ☐ Motion to set case for trial
- ☐ Pretrial statement
- ☐ Pretrial stipulation
- ☐ Diary relevant dates from pretrial order
- ☐ Prepare pretrial checklist
- ☐ Motions in limine

- ☐ Jury instructions
- ☐ Jury verdict forms
- ☐ Final settlement efforts
- ☐ Determine cost of structured settlement

TRIAL PREPARATION

- ☐ Summarize depositions
- ☐ Prepare and mark exhibits
- ☐ Prepare pretrial notebook
- ☐ Letter to witnesses advising what to expect at trial
- ☐ Prepare and subpoena witnesses
- ☐ Prepare witness list, addresses, telephone numbers, and confirm transportation
- ☐ Arrange last minute briefing conference with:
 - ☐ Trial team
 - ☐ Client
 - ☐ Witnesses
- ☐ Letters to doctors, hospitals, etc. , for update on medical bills due
- ☐ Check courtroom for facilities (view boxes, videotape arrangements, etc.)
- ☐ Obtain court docket
- ☐ Check sequencing of earlier trial to determine "ready date"

POST TRIAL

- ☐ Prepare final judgment form
- ☐ Prepare settlement sheet for client indicating distribution of case proceeds
- ☐ Prepare motion to tax costs