

**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