

**FORM OF PRE-TRIAL MEMORANDUM
FOR CLEARFIELD COUNTY**

The Court will expect the following in the nature of a Pre-Trial Memorandum* one week prior to the date of the Pre-Trial Conference.

1. A brief factual statement of the claim or defense. (This shall include all material facts to be proven by competent evidence.)
2. A list of all exhibits to be offered in evidence.
 - (a). A copy of all reports containing findings or conclusions of any physician who has treated, examined or has been consulted in connection with the injuries complained of, and whom a party expects to call as a witness at the trial of the case.
 - (b). A copy of all reports containing the substance of the facts, findings, opinions and a summary of the grounds or reasons for each opinion of any expert whom a party expects to call as a witness at trial.
3. Names and addresses of all witnesses expected to be called. Said witnesses shall be classified as liability, medical or damage witnesses.
4. A statement of the legal theory upon which the right of recovery or defense is predicted, which shall include citation of the authorities relief upon.
5. A brief description of the damages claimed and the basis therefor. There should be included a brief statement of:
 - (a). The principal injury or injuries sustained.
 - (b). Hospitalization and convalescence.
 - (c). Present disability.
 - (d). A summary of the special monetary damages.

(Include a detailed statement of loss of earnings to date and a detailed statement as to loss of future impairment of earning capacity, total medical expenses, property damages, and miscellaneous expenses.)
6. Any extraordinary evidentiary problems shall be set forth and briefed together with authorities.
7. A list of stipulations which the opposition reasonably can be expected to agree to for the purpose of avoiding the necessity of proof of matters as to which there is no basic dispute.
8. All special Points for Charge which the party wishes the court to charge on, together with authority therefor.
9. Estimated time for trial.

Counsel must be prepared to fix specific dates for trial at the Pre-Trial Conference. Dates of trial will be assigned at the Pre-Trial Conference.

***PLEASE NOTE: The original Pre-Trial Memorandum should be sent directly to the COURT ADMINISTRATOR'S OFFICE, with copies forwarded to opposing counsel.**