

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE  
IN AND FOR NEW CASTLE COUNTY

{CAPTION}

JOINT PRETRIAL MEMORANDUM

I. PARTIES

A. **Plaintiff's Submission**

- 1) Active Defendants
- 2) Dismissed Defendants
- 2) Settled Defendants

B. **Defendants' Submission** (if necessary to address Plaintiffs' Submission)

II. NATURE OF THE CASE (Brief explanation of causes of action, allegations, and defenses)

A. **Plaintiff's Submission**

B. **Defendants' Submission**

III. JOINT SUBMISSION IF APPLICABLE : FACTS ADMITTED WITHOUT FORMAL PROOF

IV. PENDING MOTIONS TO BE DETERMINED PRIOR TO TRIAL

A. **Plaintiff's Submission**

B. **Defendants' Submission**

V. EXHIBITS

Objections to any exhibits are to be made with specificity, including citation to any applicable authority and the basis for the objecting party's reliance upon that authority. Summary objections (*i.e.*, objections in the form of unexplained rule citations) are not permitted. Where an objection relates to the content of a document, a copy should be appended for the Court to review. The parties are expected to confer in an effort to resolve objections prior to submission of the pretrial memorandum.

A. **Plaintiff's Exhibits**

Exhibit	Defendants' Objections (if any)

**B. Defendants' Exhibits**

Exhibit	Plaintiff's Objections (if any)

**VI. WITNESSES**

Objections to any witnesses are to be made with specificity, including citation to any applicable authority and the basis for the objecting party's reliance upon that authority. Summary objections (*i.e.*, objections in the form of unexplained rule citations) are not permitted. The parties are expected to confer in an effort to resolve objections prior to submission of the pretrial memorandum. All depositions to be read to the jury at trial or played by video or other electronic means shall be reasonable in length.

**A. Plaintiff's Expert Witnesses**

Witness	Brief Synopsis of Expected Testimony	Issues and Defendants' Objections (if any)

**B. Plaintiff's Other Witnesses**

Witness	Brief Synopsis of Expected Testimony	Issues and Defendants' Objections (if any)

**C. Defendants' Expert Witnesses**

Witness	Brief Synopsis of Expected Testimony	Issues and Plaintiff's Objections (if any)

**D. Defendants' Other Witnesses**

<b>Witness</b>	<b>Brief Synopsis of Expected Testimony</b>	<b>Issues and Plaintiff's Objections (if any)</b>

**VII. CERTIFICATION OF GOOD FAITH SETTLEMENT NEGOTIATIONS**

- A. Plaintiff's Submission**
- B. Defendants' Submission**

**VIII. JURY SELECTION AND VOIR DIRE PROCEDURE**

- A. Plaintiff's Submission**
- B. Defendants' Submission**

**IX. LENGTH OF TRIAL**

- A. Plaintiff's Submission**
- B. Defendants' Submission**