APPENDIX B

PRETRIAL MEMORANDUM FORMAT

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

:

v. : CIVIL ACTION NO.

:

PRETRIAL MEMORANDUM

Date conference was held by counsel:

- A. A brief statement as to federal court jurisdiction.
- B. A summary statement of facts and contentions as to liability.
- C. A comprehensive statement of undisputed facts as agreed to by counsel at the conference of attorneys required by Local Rule 16.3. No facts should be denied unless opposing counsel expects to present contrary evidence or genuinely challenges the fact on credibility grounds. The parties must reach agreement on uncontested facts even though relevancy is disputed.
 - D. A brief description of damages, including, where applicable:
 - (1) Principal injuries sustained:
 - (2) Hospitalization and convalescence:
 - (3) Present disability:
- (4) Special monetary damages, loss of past earnings, medical expenses, property damages, etc.:

- (5) Estimated value of pain and suffering, etc.:
- (6) Special damage claims:
- E. Names and addresses of witnesses, along with the specialties and qualifications of experts to be called.
 - F. Summary of testimony of each expert witness.
- G. Special comment about pleadings and discovery, including depositions and the exchange of medical reports.
 - H. A summary of legal issues involved and legal authorities relied upon.
 - I. Stipulations desired.
 - J. Estimated number of trial days.
 - K. Any other matter pertinent to the case to be tried.
- L. Pursuant to Local Rule 16.3 append to this memorandum a prenumbered schedule of exhibits, with brief identification of each, on the clerk's Exhibit Form.
 - M. Append any special verdict questions which counsel desires to submit.
- N. Defense counsel must file a statement that the person or committee with settlement authority has been notified of the requirements of and possible sanctions under Local Rule 16.2.
- O. Certificate must be filed as required under Local Rule 30.10 that counsel have met and reviewed depositions and videotapes in an effort to eliminate irrelevancies, side comments, resolved objections, and other matters not necessary for consideration by the trier of fact.
- P. In all trials without a jury, requests for findings of both fact and law shall be submitted with this Memorandum as required under Local Rule 48.2.