**IN THE CHANCERY COURT FOR HENRY COUNTY, TENNESSEE**

**AT PARIS**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, )**

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 **Plaintiff, ) )**

**v. ) Case No. ­­­\_\_\_\_\_\_**

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**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, )**

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**Defendant. )**

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**ORDER FOR PRETRIAL CONFERENCE**

 WHEREAS, the above-styled cause is at issue, and it appears to the Court that a trial by jury has been demanded and set for \_\_\_\_\_\_\_\_\_\_\_\_\_, a Pre-trial Conference shall be conducted, attended by counsel with full authority: to make disclosure of facts; admit and stipulate to undisputed facts; advise the Court on the proper number of jurors and alternate jurors to be empaneled; discuss the number of preemptory challenges that will be awarded for the purpose of voir dire; waive requirements of formal proof of documents; furnish the names and addresses of witnesses and the nature of their testimony; submit documentary proof, photographs and other proposed exhibits; argue any motions not previously decided; discuss points of law and submit trial briefs thereon, and address jury instructions to be requested by the Court, thereby enabling the entry of a pre-trial order setting out the nature of the case, theories of the parties, the admitted facts, the ultimate facts that will be disputed; and it appearing proper to the Court,

**IT IS THEREFORE ORDERED:**

1. That the parties shall appear for a Pre-Trial Conference on \_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_ at \_\_\_\_\_\_ a.m./p.m. before the Court at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_;
2. That each party, unless appearing pro se, shall be represented at the Pre-Trial Conference by counsel who will conduct the trial or by co-counsel with full knowledge of the case and with authority to bind such party, ready and able to address all of the issues listed above;
3. That in the event of the failure of counsel (or pro se party) to appear, pursuant to this Order, an exparte hearing shall be held and an appropriate judgement rendered or dismissal ordered, unless continued, pursuant to a request made at least 48 hours in advance, for good cause shown;
4. To prepare for the Pre-Trial Conference, each party shall mail/email/fax/hand-deliver to the other party, email the Judge’s Office Staff at \_\_\_\_\_\_\_\_\_\_\_\_\_, and file with the Clerk’s Office no later than five (5) Judicial Days prior to thew Pre-Trial Conference, the following:
5. A concise factual statement of his/her client’s claim and/or defense, including specification of all damages claimed, if any;
6. A list of names and addresses of all non-expert witnesses who are expected to testify at the trial of this cause, and identify any witness requesting to appear telephonically or virtually;
7. A list of names and addresses of all expert witnesses expected to testify at trial of this cause, and identify any expert requesting to appear telephonically or virtually; the expert witness list should include the expert’s area of expertise, a copy of any reports prepared by the expert, any answers to the expert interrogatories or, if none exist, a summary of testimony the expert expects to provide;
8. A list of proposed exhibits with each exhibit marked for identification;
9. A list of proposed pattern jury instructions and separate special instructions to be requested, and
10. A proposed verdict form;
11. Stipulate as to any matter of fact or law about which there is no issue;

 Counsel for the parties are strongly encouraged to collaborate with one another in order to submit items five and six as a joint proposal.

1. That counsel shall file no later than five (5) Judicial Days prior to the Pre-Trial Conference any and all Motions in Limine and be prepared to argue those on the date of the Pre-Trial Conference. Further, counsel shall be prepared to argue any objections to portions of the deposition testimony, or proposed exhibits.
2. Any motions, excluding motions in Limine, not argued prior to the Pre-Trial; Conference shall be deemed abandoned.
3. Counsel shall complete all discovery, including independent medical examinations, at least 15 days prior to the first day of trial. Discovery conducted after this time period shall only be permitted by order of the Court for good cause shown.
4. All provisions of this Order that require compliance by counsel are likewise applicable to any party appearing pro se.
5. Failure to comply with the requirements of this Order subject counsel and parties to such sanctions as the Court determines just and proper under the circumstances.

**IT IS SO ORDERED, this the \_\_\_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_.**

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 CHANCELLOR/JUDGE

**CERTIFICATE OF SERVICE**

 I hereby certify that a true and exact copy of the foregoing Order has been sent via U.S. Mail, postage prepaid, first class to the following individuals at their respective addresses this the \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_\_.

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