|  |
| --- |
| UNITED STATES DISTRICT COURT  EASTERN DISTRICT OF TEXAS |
|  |
| No. 6:XX-cv-00XXX |
|  |
| Party Name,  Plaintiff,  v.  Party Name,  Defendant. |
|  |

**Joint Final PreTrial REPORT**

1. Counsel for the parties

Plaintiff(s):

Defendant(s):

1. Statement of jurisdiction

[Include a brief statement explaining the basis for this court’s jurisdiction and whether any party disputes jurisdiction.]

1. Nature of the action

[Include a brief summary of the cause(s) of action and the relief sought.]

1. Contentions of the parties

[Include a brief statement from each party on the claims and issues to be tried. These should be in a form suitable to be read to the jury.]

1. Stipulations and uncontested facts

[Include any relevant facts that are not in dispute.]

1. Contested issues of fact and law

[Include relevant, disputed facts to be presented to the jury, and disputed issues of law remaining for the court.]

1. Pending motions

[List all pending motions.]

1. Probable length of trial

The trial is expected to last \_\_\_ hours.

1. Trial management procedures

[The parties should include any agreed-upon trial procedures for managing demonstratives, witnesses, and exhibits. In particular, the parties should consider and identify (1) what constitutes a “demonstrative” and agreed-upon deadlines for exchanging demonstratives for direct or cross; (2) agreed-upon deadlines for identifying witnesses to be called, whether in person or by deposition; (3) agreed-upon deadlines for identifying exhibits to be used during trial; (4) a conference procedure to address disputes arising from the aforementioned disclosures; and (5) any other trial management procedure.]

1. Witness lists

[Each party’s witness list should be attached as an appendix to the pretrial report. Witness lists should identify any witness to be presented by deposition.]

1. Deposition designations

[Attach each party’s deposition designations as an appendix to the pretrial report.]

1. Exhibit lists

[Attach each party’s exhibit list as an appendix to the pretrial report.]

1. Certifications

The undersigned counsel for each of the parties in this action hereby certify and acknowledge the following:

(A) Full and complete disclosure has been made in accordance with the Federal Rules of Civil Procedure and the court’s orders;

(B) Discovery limitations set forth in the Federal Rules of Civil Procedure, the Local Rules, and the court’s orders have been complied with;

(C) Each exhibit in the Exhibit List herein:

(i) exists;

(ii) is numbered; and

(iii) has been disclosed and shown to opposing counsel.