JOINT PRE-TRIAL ORDER

This Court requires a Joint Pre-Trial Order. The parties are required to submit in writing a pre-trial order to the Court. Unless otherwise instructed, it is due at the Pre-Trial Conference. The Pre-Trial Order must contain the following:

1. Parties and Counsel. (List all parties and counsel including address and telephone information in separate paragraphs).

2. A concise statement of the case and contentions of the parties in separate paragraphs.

3. Motion in Limine and other unresolved motions.

4. Admissions of Fact. (List all facts which have been stipulated and admitted and require no proof).

5. Contested fact issues.

6. Agreed applicable propositions of law.

7. Contested issues of law. (State briefly the issues of law in dispute, with a memorandum of authorities supporting each issue).

8. Names and addresses of witnesses (fact and expert) who may be used with a brief statement of the subject matter and substance of their testimony. This list must be supplemental within the time limits imposed by the Texas Rules of Civil Procedure.

9. Attachments:

   a. For a Jury Trial: Proposed Special Issues, including instructions and definitions.

   b. For a Non-Jury Trial: Proposed finding of facts and conclusions of law with supporting authorities.

10. Exhibits:

    a. Each counsel will attach to the Joint Pre-Trial Order a copy of the list of all exhibits to be offered and will make all such exhibits available for examination by opposing counsel. (Does not apply to rebuttal exhibits).

    b. The Court will require parties to pre-mark exhibits, and objections to exhibits must be made to the Court in writing accompanied by supporting legal authorities. (Objections and authority must be received by Court at least three (3) business days prior to trial).

11. Trial:

    a. Probable length of trial.

    b. Availability of witnesses and any special witness requirements or time problems.

12. Each counsel will attach an exhibit which lists page and line numbers of any excerpts from depositions which may be offered. (Note: Video depositions to be edited by counsel PRIOR to their presentation to the Court).