

**CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS  
STATE OF LOUISIANA**

Case Number

versus

**FILED**

**FILED:** \_\_\_\_\_

\_\_\_\_\_  
**DEPUTY CLERK**

**JOINT PRE-TRIAL OUTLINE FORMAT**

**NOW INTO COURT**, through undersigned counsel, comes Plaintiff(s), and Defendant(s), in the above entitled and numbered cause, for the purpose of filing this pre-trial outline.

**ATTORNEYS**

Attorney(s) for Plaintiff

Attorney(s) for Defendant

(Please provide address and all contact information, including office, cell and e-mail)

- 1) **SUMMARY OF FACTS**
- 2) **JOINT FACTUAL BLURB:** Include 3-4 sentences agreed upon by all parties regarding the basic facts of this case that can be read to the jury during preliminary/opening instructions.
- 3) **STIPULATIONS**
- 4) **POSSIBLE STIPULATIONS**
- 5) **CONTESTED ISSUES OF FACT AND LAW**
- 6) **LIST ALL "WILL CALL" FACT WITNESSES**  
(Please indicate if testimony will be presented by deposition transcript, videotape or otherwise)
- 7) **LIST ALL "WILL CALL" EXPERT WITNESSES**  
(Please indicate if testimony will be presented by deposition transcript, videotape or otherwise)
- 8) **LIST OF EXHIBITS**  
(Please designate List as Plaintiff's, Defendant's or Joint & provide Court with copy of properly tabbed Bench Book)
- 9) **MEDICAL SUMMARY**
- 10) **CITATIONS, AUTHORITIES & QUANTUM**
- 11) **SUGGESTED SPECIAL JURY INSTRUCTIONS** (if applicable)
- 12) **SUGGESTED JURY INTERROGATORIES** (if applicable)
- 13) **CERTIFICATION OF COUNSEL AND SIGNATURE**