

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

NO.

DIVISION "F"

SECTION 14

PLAINTIFF

VERSUS

DEFENDANT

JOINT SETTLEMENT CONFERENCE OUTLINE

NOW INTO COURT, through undersigned counsel Plaintiff[s] _____ and Defendant[s] _____ in the above entitled and numbered cause, who provide this settlement conference outline/position paper for the purposes of having meaningful settlement discussions with the Court.

A settlement conference is scheduled for _____ at _____ o'clock ____M. The jury trial/non-jury trial is to last _____ day[s].

The settlement conference outline is due on the _____ day of _____, _____, which is three [3] business days prior to the settlement conference. Accordingly, the settlement conference outline was emailed to Chale@Orleanscdc.com for the Judge, and unless not done jointly, a copy delivered to all counsel of record on _____.

Attorney for plaintiff[s]

Attorney for Defendant[s]

- [1] **Summary of Facts**
- [2] **Summary of Damages**
- [3] **Stipulations**
- [4] **Possible Stipulations**
- [5] **Contested Issues of Fact and Law**
- [6] **Listed of Fact Witnesses (Please indicate if testimony will be presented by deposition transcript, videotape, or otherwise.)**
- [7] **List of Expert Witnesses (please indicate if testimony will be presented deposition transcript, videotape, or otherwise.)**
- [8] **List of Exhibits**
- [9] **Medical Summary**

[10] Citations, Authorities & Quantum

[11] Suggested Jury Instructions (If applicable.)

[12] Suggested Jury Interrogatories (IF applicable.)

RESPECTFULLY SUBMITTED,

Signed by all counsel

CERTIFICATION OF COUNSEL

The undersigned counsel will hereby certify that this settlement conference outline has been formulated after a conference at which counsel for the respective parties have appeared in person. Reasonable opportunity has been afforded counsel for corrections or additions prior to signing. Hereafter, this outline will control the course of the trial and may not be amended except by consent of the parties and the Court, or by order of the Court to prevent manifest injustice. Possibility of settlement of this case was considered. If this case settles prior to the morning of trial, it is the responsibility of the plaintiff's attorney to immediately telephone and notifies the Court.

The undersigned counsel further certify that they have been informed of the Court's requirement that all settlement conference outlines must be filed three [3] business days prior to the conference and that the Court requires that attorneys appear at conferences timely and prepared. Counsel is aware that failure to follow these guidelines may result in the Court imposing sanctions pursuant to LSA-C.C.P. article 1551[C].

Signed by all counsel