

Cause No: _____

§ IN THE DISTRICT COURT
V. § 341ST DISTRICT COURT

§ WEBB COUNTY, TEXAS

JOINT FINAL PRE-TRIAL REPORT

1. APPEARANCE OF COUNSEL. List each party's counsel, counsel's address, telephone and fax numbers and email address in separate paragraphs.
(List here)
2. STATEMENT OF THE CASE. Give a brief statement of the case, one that the judge could read to the jury panel as an introduction to the facts and parties include names, dates, and places.
(List here)
3. JURISDICTION. Briefly specify the jurisdiction of the subject matter and the parties. If there is an unresolved jurisdictional question, state it.
(List here)
4. MOTIONS. List all pending trial motions.
(List here)
5. CONTENTIONS OF THE PARTIES. State concisely in separate paragraphs each party's contentions.
(List here)
6. ADMISSIONS OF FACT. List all facts that are stipulated to.
(List here)
7. CONTESTED ISSUES OF FACT. List all material facts in controversy.
(List here)
8. AGREED PROPOSITION OF LAW. List the legal propositions that are not in dispute.
(List here)
9. CONTESTED PROPOSITIONS OF LAW. State briefly the unresolved questions of law, with authorities to support each.
(List here)
10. EXHIBITS.
 - a. Each party will attach to the Joint Pre-trial Order a copy of their exhibit list, pre-marked in numerical order with the case number.
 - b. All documentary exhibits must be exchanged at least ten business days before the final pre-trial hearing,

except for rebuttal exhibits or those whose use cannot be anticipated.

- c. A party requiring authentication of an exhibit must file a written objection at least three business days before the pre-trial hearing. Failure to timely object will be deemed to concede authenticity and admissibility.
- d. Objections to the opposing party's exhibits, stating the basis for each objection, must be filed at least three business days before the final pre-trial hearing. Failure to timely object will be deemed to concede authenticity and admissibility. The court shall take these objections up at the pre-trial hearing.
- e. At the trial, the first order of business will be to receive in evidence all listed exhibits that have been stipulated to be admissible and authentic.

11. WITNESSES.

- a. List the names, addresses and phone numbers of all witnesses who may be called to testify, together with a brief statement of the nature of their testimony.

(List here)

- b. Include the qualifications of expert witnesses and the subject of the testimony and opinions of each such expert witness. Any dispute or objection regarding any expert witness' qualifications shall be filed in writing by the date given in the Pre-trial Guideline Order and must be resolved by a hearing no later than the pre-trial hearing.

12. SETTLEMENT. State the status of any settlement negotiations.

(List here)

13. TRIAL. Attach the estimated length of trial and list logistical problems, including availability of witnesses, out-of-state people, bulky exhibits, demonstrations, equipment and interpreters needed.

14. ATTACHMENTS.

- a. Jury Trial. Attach a hard copy or email a proposed charge, including instructions, definitions and jury questions, with case law or formbook reference (on CD-R or pen drive using Microsoft Word).
- b. Non-jury Trial. Attach proposed findings of fact and conclusions of law, with authority.

15. FAILURE TO FILE. Not filing the Joint Final Pre-Trial Report will trigger a notice of a hearing to show cause why the attorneys and parties should not be held in contempt.

16. DEADLINE TO FILE. This Joint Final Pre-Trial Report is due no later than 7 working days before the Final Pre-Trial hearing.

Signed this _____ day of _____, 20____.

Beckie Palomo, Judge Presiding

Counsel for Plaintiff(s) or Pro Se Plaintiff

Counsel for Defendant(s) or Pro Se Defendant

Print

Print

Address

Phone

Email

Client(s)

Address

Phone

Email

Client(s)