

IN LIMINE WORKSHEET

1. Who will be trying the case for each party? If more than one lawyer per party, list all and designate who lead counsel is for each party.

Plaintiff(s):

Defendant(s):

2. Where can trial counsel be reached after hours, if necessary?

Plaintiff(s):

Defendant(s):

3. How long will it actually take to try this case?

4. Witnesses: each party to list witnesses in order you anticipate calling them, noting any potential scheduling problems, including having to call witnesses out of order. If there are any objections to calling that witness or those witnesses out of order, state them here.

5. Exhibits: what exhibits can be admitted into evidence now? What exhibits cannot be admitted now (all objections should be noted)?

6. Objections to court's proposed instructions/verdict form. Proffer of other proposed instructions/verdict form.

7. In limine motions.

8. Expert reports: any 26(a)(2) problems? Copies of all reports and supplements to everyone?

9. All demonstrative/visual aids disclosed? Problems?

10. Objections to use of demonstrative/visual aids in opening statements?

11. Special equipment needs?

12. Trial schedule:

1st day: counsel here at 8:30 a.m., jury selection begins at 9:00 a.m., trial until 4:30 p.m.

2nd and subsequent days: start trial at 8:00 a.m., until 1:30 p.m.; will have a conference when trial recesses for day to confirm witnesses and exhibits for following day and to look at any anticipated problems.

13. Trial procedure:*
- A. Voir Dire: lawyers are allowed to question jurors – amount of time will vary based upon number of parties, type of case, etc.; will determine number of jurors and number of peremptory challenges.
 - B. Opening Statements: how much time need?
 - C. Examination of Witnesses: do not need to ask permission to approach witness to assist or hand exhibit; can move around the courtroom while questioning so long as everyone can hear and counsel is not attempting to intimidate or abuse witness or climb into the jury box.
 - D. Closing Argument: how much time need?
 - E. Communications with Jurors after Verdict: I generally allow it, but will impose some conditions.
14. Any miscellaneous matters any party wishes to raise:

* In cases involving multiple plaintiffs and/or multiple defendants, there will be additional matters to address, including apportionment of time for voir dire, opening statements, and closing arguments, how many lawyers will examine each witness, whether examination is direct or cross, etc.