

Pretrial Conference Checklist

Following is a more extensive checklist that may be consulted when preparing for a final pretrial conference:

- **Issues with Jury:**
 - _____ Manner in which judge will introduce the case.
 - _____ Caption of case that will be read to jury.
 - _____ Number of potential jurors called.
 - _____ Number of strikes for each party.
 - _____ Limitations to voir dire.
 - _____ Questions court will ask in voir dire.

- **Limiting the issues:**
 - _____ Stipulations. See §§ 6:10-6:14.
 - _____ Elimination of unnecessary claims or defenses.
 - _____ Remaining issues of fact.

- **Legal issues:**
 - _____ Jury instructions and special verdicts.
 - _____ Motions in limine. See §§ 6:20-6:32.
 - _____ Issues of law.
 - _____ Dates for exchange of any final briefs or other documents.

- **Evidentiary issues:**
 - _____ Advance rulings on admissibility of questionable evidence.
 - _____ Admissibility issues with documentary evidence.
 - _____ Admissibility of simulated evidence, such as “dummy tells all” videos.
 - _____ Use of experiments.
 - _____ Use of models.
 - _____ Absent witnesses.
 - _____ Telephonic testimony.
 - _____ Use of deposition transcripts instead of witnesses.
 - _____ Admissibility of certain expert or opinion evidence.
 - _____ Bifurcation of any issues.

- **Trial management:**
 - _____ Anticipated lay witnesses.
 - _____ Anticipated expert witnesses
 - _____ Trial Exhibits.
 - _____ Jury view.
 - _____ Order of proof
 - _____ Taking testimony out of order for convenience of certain witnesses.
 - _____ Equipment needs.

- _____ Marking exhibits.
- _____ Number of copies of exhibits necessary for trial.
- _____ Necessity of interpreters.

- **Miscellaneous:**

- _____ Contact information the day before trial
(in the event of last-minute adjournment).
- _____ Shared use of certain equipment, such as a document camera.
- _____ Time for setting up equipment.
- _____ Start time for trial.
- _____ Parking arrangements.

- **Timing Issues:**

- _____ Voir dire in relationship to opening statement.
- _____ Closing argument in relationship to jury charges.
- _____ Quitting time at the end of each day.