

INSTRUCTIONS FOR FILING OF PRE-TRIAL MEMORANDUM - CLEARFIELD COUNTY

Rule 212.4 (e) Pre-Trial Conference *[rev. 4-27-17]*

(e) **One week before the date set for the pre-trial conference** each party shall file a pre-trial statement with the Prothonotary containing the following:

- (1) A narrative statement of the facts that will be offered by oral or documentary evidence at trial, and a statement of any unusual questions of evidence anticipated with respect to proof of such facts.
- (2) A statement of any unusual question of law anticipated with respect to the issues in the case. All such questions shall be presented with a statement of authority supporting the position taken with respect to such unusual questions of law.
- (3) A list of names and addresses of all persons who may be called as witnesses, classifying them as liability and/or damage witnesses.
- (4) Medical reports of any doctor who treated, examined or was consulted in connection with the injuries complained of, and who may be called as a witness.
- (5) The reports of any expert whose opinion will be offered in evidence at the time of trial. Such report shall include the findings and conclusions of the expert.
- (6) A list of all items of special damages which the party intends to prove, including medical bills, property damage bills (or estimates if there are no bills) and loss of earnings. Claims for loss of earnings shall set forth the names of employers, dates of absences and rates of pay. If the party is self-employed, information which forms the basis for the loss of income attributable to the injuries shall be supplied.
- (7) A list of exhibits which the party may use at trial.
- (8) A copy of any photographs, plan or plot proposed to be introduced into evidence.
- (9) An estimate of the length of time which will be required to try the case.
- (10) A list of proposed stipulations or special arguments which would simplify the trial of the case.

Counsel must be prepared to fix specific dates for trial at the Pre-Trial Conference.

COURTESY COPIES DO NOT NEED TO BE SENT TO THE JUDGE.