

JOINT TRIAL MEMORANDUM INSTRUCTIONS FOR THE HONORABLE ALFRED V. COVELLO

The parties shall confer and jointly prepare a trial memorandum in compliance with the district's standing order regarding such memoranda in civil cases.

- (1) TRIAL COUNSEL: Counsel shall list the names, addresses, telephone numbers, fax numbers and e-mail addresses of the attorney(s) who will try the case.
- (2) JURISDICTION: Counsel shall set forth the basis for federal jurisdiction.
- (3) JURY/NON-JURY: Counsel shall state whether the case is to be tried to a jury or to the court.
- (4) NATURE OF THE CASE: Counsel for both parties shall separately state the nature of each cause of action and the relief sought. If appropriate, state the nature of any cross-claims, counterclaims and/or affirmative defenses.
- (5) STIPULATIONS OF FACT AND LAW: Counsel for both parties shall confer in an effort to enter into a written stipulation of uncontroverted facts and into an agreed statement of the contested issues of fact and law.
- (6) LEGAL ISSUES: Counsel shall state legal issues, if any, to be determined.
- (7) VOIR DIRE QUESTIONS: Counsel shall attach a list of proposed questions to be submitted to the jury panel.
- (8) LIST OF WITNESSES: Counsel shall include a list of the witnesses they intend to call to testify during the trial.
- (9) EXHIBITS: Counsel shall include a list of all exhibits—including a brief description of their contents—to be offered at trial. The parties shall mark all exhibits numerically with exhibit tags which will be provided by the clerk's office upon request.
- (10) DEPOSITION TESTIMONY: Counsel shall list each witness who is expected to testify by deposition at trial.
- (11) REQUESTS FOR JURY INSTRUCTIONS: Counsel shall attach requests for jury instructions, citing relevant legal authority for each proposed instruction. Counsel are not required to submit general jury instructions.
- (12) ANTICIPATED EVIDENTIARY PROBLEMS: Counsel shall list any evidentiary problems anticipated by any party.
- (13) PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW: Counsel for both parties shall confer in an effort to enter into a written stipulation of uncontroverted facts and into an agreed statement of the contested issues of fact and law.

(14) LENGTH OF TRIAL: Counsel shall set forth a realistic estimate of trial days required.

(15) FURTHER PROCEEDINGS: Counsel shall specify, with reasons, the necessity of any further proceedings prior to trial.

(16) COURTROOM TECHNOLOGY: Counsel shall specify what, if any, technology they intend to use during trial. For instance, counsel must specify if they intend to use an overhead projector, transparencies, Elmo, or to connect a laptop to display exhibits or other documents. Counsel may coordinate with the courtroom deputy, Renée Alexander, to set up any **technology request two weeks in advance of trial**. renee-alexander@ctd.uscourts.gov

Technology Requests are located at:

<http://www.ctd.uscourts.gov/sites/default/files/forms/request4courtroomtech5313.pdf>

(17) TRIAL BY MAGISTRATE JUDGE: Counsel shall indicate whether they have agreed to a trial by a magistrate judge and, if so, file signed consent forms providing for any appeal to be heard directly by the court of appeals.