

4. The attorneys for all parties are directed to meet together by agreement, initiated by counsel for the Plaintiff, no later than fourteen **(14) days** before the Pre-Trial Conference, to:

- a) Mark all exhibits for identification;
- b) Prepare an exhibit list for the Clerk and Court (actual exhibits and documentation evidence shall be available for inspection at this time);
- c) Stipulate to the admission into evidence or list specific objections, if any, to each proposed exhibit;
- d) Stipulate as to any matter of fact and law about which there is no issue to avoid unnecessary proof;
- e) Review all depositions which are to be offered for any purpose other than impeachment to resolve objections to the portions to be offered in evidence;
- f) Discuss the possibility of settlement;
- g) Submit an itemized statement of special damages Plaintiff expects to prove;
- h) Discuss and complete any other matters which may simplify the issues or aid in the speedy disposition of this action, its Pre-Trial Conference and Trial.
- i) Draft one Pre-Trial Conference Order (using the form attached), signed by all participating counsel, that shall be **submitted directly to the Court at least three (3) days prior to the Pre-Trial Conference**. In the event the parties are unable to agree on any matter in the Pre-Trial Conference Order, they shall leave the matter blank and same will be resolved at the Pre-Trial Conference.

5. All motions including motions in limine shall be filed and heard prior to the Pre-Trial Conference. All motions not heard prior to the Pre-Trial Conference shall be deemed abandoned.

6. Any discovery conducted after the discovery cut off set in the CMC Order shall only be permitted on order of the Court for good cause shown.

7. The case shall be mediated or arbitrated in accordance with the CMC Order.

