



and addresses of all witnesses, including expert witnesses and rebuttal witnesses, that are expected to testify at the trial of this cause. Each party's witness list shall specifically designate all expert witnesses and with respect to each expert witness each party shall disclose the expert's area of expertise, and serve a copy of each expert's reports or answers to expert interrogatories. In the absence of answers to expert interrogatories or an expert report, a party shall provide a summary of the testimony the expert is expected to provide.

4. Counsel shall complete all discovery, including compulsory medical examinations, at least **30 days** prior to the Pre-Trial Conference. Discovery conducted after this time period shall only be permitted on order of the Court for good cause shown.

5. All dispositive motions and all Frye challenges shall be filed not later than 45 days before the Pre-Trial Conference and shall be scheduled for hearing prior to the Pre-Trial Conference. All other motions shall be filed and heard prior to the Pre-Trial Conference. All motions, except motions in limine, not heard by the Pre-Trial Conference shall be deemed abandoned. Motions in limine shall be filed not less than **7 days** prior to the trial and shall be scheduled for hearing on or before the Friday before trial. Objections raised in depositions expected to be introduced at trial shall be scheduled for hearing on or before the Friday before trial.

6. The attorneys for all parties are directed to meet together by agreement initiated by counsel for the Plaintiff, no later than **10 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 order located at the Court website www.fljud13.org), signed by all participating counsel, that shall be **submitted directly to the Court at least 3 days prior to the Pre-Trial Conference**. In the event the parties are unable to agree on a matter in the Pre-Trial Conference Order, the matter will be resolved at the Pre-Trial Conference.

7. The parties shall submit the cause to mediation or arbitration which shall be completed **30 days** prior to the Pre-Trial Conference unless waived by the Court.

8. Instructions and verdict forms shall be submitted to the Court no later than the last business day of the week prior to the trial week. Each instruction shall be on a separate sheet of paper. A complete set of proposed jury instructions and verdict forms shall also be submitted to the Court in Word format, on CD-R disc. Counsel shall confer prior to trial as to any agreement they can reach on the instructions and verdict forms and advise the court.

In order that the Court may provide the jury with a set of written jury instructions for consideration during deliberations, the parties shall provide the Court at trial a clean copy of the requested instructions and proposed verdict form (not numbered and with no designation as to the requesting party or citations to supporting authority).

9. Counsel shall be prepared to negotiate settlement at the Pre-Trial Conference and have full authority to settle the case or have available at the conference a party or representative who does have full authority to settle.

10. In order for the full purpose of the Pre-Trial procedures to be accomplished each party shall be represented at all meetings and hearings herein described by an attorney and party or agent who will participate in the trial of the cause and a person who is vested with full authority to make admissions and disclosures of fact and to bind his or her clients by agreements in respect to all matters pertaining to the trial of the cause and the Pre-Trial Conference.

11. Failure to comply with the requirements of this Order shall subject counsel and the parties to such sanctions as the Court shall determine just and proper under the circumstances.

12. The parties shall do all things reasonable and necessary to assure the availability of their witnesses for the entire trial period or to otherwise preserve their testimony for trial as provided by the Florida Rules of Civil Procedure.

13. Counsel shall immediately notify this Court in the event of settlement, and submit a stipulation for an Order of Dismissal and a Final Disposition form. Counsel shall likewise notify this Court in the event the parties wish to avail themselves of the “Voluntary Trial Resolution” provisions of Chapter 44 of the Florida Statutes.

14. No later than 7 days prior to the Pre-Trial Conference the attorneys for all parties shall notify the Court’s Business Center (CBC) (813-272-5520) as to any audio-visual equipment or other multi-media technology they intend to reserve for use at trial, as indicated in paragraph 24 of the UNIFORM PRE-TRIAL CONFERENCE ORDER.

15. No later than 7 days prior to the Pre-Trial Conference the parties shall, if desired, secure the services of a court reporter for trial.

16. All provisions of this order that require compliance by counsel are likewise applicable to any party appearing pro se.

