

UNITED STATES OF AMERICA
STATE OF ILLINOIS COUNTY OF _____
IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT

Plaintiff

vs.

Case No. _____

Defendant

PRE-TRIAL MEMORANDUM - DEFENDANT'S

- | | Name | Age |
|---|-----------|-------|
| 1. Defendants : | (a) _____ | _____ |
| | (b) _____ | _____ |
| 2. Defendant's Allegations: | | |
| (a) Disputed occurrence facts: _____ | | |
| (b) Liability theory disputes: _____ | | |
| (c) Damages questioned (type and amount): _____ | | |
| 3. Trial Matters: | | |
| (a) Estimated number of witnesses: _____ Occurrence and _____ damages | | |
| (b) Names of physicians/expert witnesses: _____ | | |
| (c) Estimated number of exhibits: _____ Occurrence and _____ other | | |
| (d) Is there a counterclaim? _____ Yes _____ No | | |
| If yes, state the nature thereof: _____ | | |
| Theory of liability and the amount claimed: _____ | | |
| (e) Unusual legal, evidentiary, or medical questions which may arise: _____ | | |
| (f) Estimated trial time for defendant's case: _____ days. | | |
| 4. Defendant's insurance coverage: | | |
| Company: _____ Policy limits: \$ _____ | | |
| 5. Defendant's top offer of settlement: \$ _____ | | |
| Conditions of offer: _____ | | |
| 6. Suggestions in aid of settlement or simplifying trial procedures: _____ | | |
| 7. Is this case ready for trial? _____ Yes _____ No | | |
| If not, state why: _____ | | |

NOTE: The pre-trial conference must be attended by the attorney who will try the case. One copy of this memorandum shall be submitted to the court and one copy mailed to opposing counsel at least five (5) days prior to the conference. Please refer to Rule 3.6(c) of the Rules of Practice, 13th Judicial Circuit, concerning the requirements of a Summary Statement of Points and Authorities.