

Attachment C

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**
Choose an item. **DIVISION**

, Plaintiffs,	}	
	}	
v.	}	
	}	Case No.: Case Number.
,	}	
	}	
Defendants.	}	
	}	

PROPOSED PRETRIAL ORDER

The court held the final pretrial conference in this case on _____. Consistent with the discussions held on the record at the conference, the court **ENTERS** the following rulings.

1. Parties and Trial Counsel. Any remaining fictitious parties are hereby **STRICKEN**. The parties and designated trial counsel are correctly named as set out below: **[Include a line and designation for each party in the case.]**

Parties:	Trial Counsel:
<i>[Name of the Plaintiff(s)]</i>	<i>[Name of Counsel]</i>
<i>[Name of the Defendant(s)]</i>	<i>[Name of Counsel]</i>

2. Nature of the Action, Jurisdiction and Venue.

- (a) The nature of this action is as follows: **[For example, employment discrimination; Fair Labor Standard Act, breach of contract, etc.]**
- (b) The court has subject matter jurisdiction of this action under **[List each statute, rule or case claimed to authorize the court's subject matter jurisdiction in this action].**
- (c) All jurisdictional and procedural requirements prerequisite to maintaining this action **[have/have not]** been met.
- (d) Personal jurisdiction and/or venue [are/are not] contested. **[If personal jurisdiction or venue is contested, briefly set out the relevant arguments.]**

3. Pleadings. The following pleadings have been allowed:

[List pleadings in the order in which they were filed and allowed. Do not include pleadings that have been stricken or otherwise disallowed. See Fed. R. Civ. P. 7(a) for a list of allowable pleadings.]

4. Statement of the Case.

[Taken from statement of facts submitted by parties before pretrial scheduling conference]

5. Contentions of the Parties

[Taken from the contentions submitted by parties before the pretrial scheduling conference.]

(a) *Plaintiff's Contentions*

(b) *Defendant's Contentions*

6. Stipulated Facts The parties stipulate to the facts set out in Exhibit A to this pretrial order. **[In a separate document identified as Exhibit A, please separate out each stipulated fact in numbered paragraphs. These facts will be read to the jury in advance of opening argument]**

7. Trial Exhibit List. Consistent with § III(3) of the pretrial scheduling order, a thumb drive containing a .pdf document of the joint trial exhibit list and a separate file for each premarked exhibit has been submitted to the courtroom deputy. Additionally, a Word version of the joint trial exhibit list has been submitted to chambers via email. The joint trial exhibit list is incorporated here by reference.

8. Witness List [**identify all witnesses and separate into the following categories**]

(a) *Live Witnesses*

(b) *Deposition Testimony*

(c) *Video Deposition*

9. Damages

The damages sought in this action are as follows: [**using the same format as plaintiff's initial damages submission, provide the list of damages and equitable relief claimed with any necessary revisions to reflect rulings made during the pretrial conference**].

10. Proposed Jury Instructions. The proposed jury instructions are set out in Exhibit B. The parties reserve all objections set out therein.

10. Voir Dire Questions. The parties do not object to the court asking the questions set out in Exhibit C during voir dire. [**Exhibit C should include all questions set out in Attachment B to the pretrial scheduling order along with any additional questions the parties agree on**]

DONE and **ENTERED** this _____