

TRIAL AGREEMENTS

1. Agreed briefing schedules on all pretrial motions
2. Date for exchanging real live witness list. Any witness who appears on a party's live witness list whom the other side has not deposed, can be deposed before the final pretrial
3. Agreement on the length of the trial
4. An agreed Motion in Limine plus a briefing schedule for opposed motion
5. All trial exhibits listed on the exhibit lists the parties exchanged before trial are deemed admitted when the trial starts if no party has objected to their admission by that time
6. All exhibits produced by a party are deemed authentic. All exhibits produced by certain third-parties are authentic
7. Deadlines for exchanging exhibit objections and a time to meet and confer on them
8. Deposition counter-designations will be counted against the designator's time. Counter-designations for optional completeness will be played during the "direct examination" portion of the video playback. All counter-designations will be played in full after the "direct examination" portion of the video playback is completed

9. The parties will exchange proposed jury questionnaires on _____ and try to reach agreement before the pretrial conference
10. An agreed juror notebook containing glossary, cast of characters, chronology, any key documents
11. The jurors can take notes, can use their own notes during deliberations and can direct, through the judge, witness questions to each witness before he leaves the stand
12. Distributing sheet for jurors to take notes on before each witness testifies, that contains his photo and title
13. The parties shall notify opposing parties of the order in which they plan to call live witnesses each Friday by 5pm for the following week. The parties shall further notify opposing parties 36 hours before any particular witness is called live
14. Demonstrative exhibits (i.e., those that do not go back into the jury room) need not be listed on the parties Trial Exhibit lists. Those to be used on direct examination, opening or closing will be provided to opposing counsel before the session (morning or afternoon) in which they will be used.
15. The parties will exchange proposed jury instructions on _____ and try to reach

agreement before the trial court sets a charge conference

16. The parties will ask the court to instruct the jury before final arguments
17. The parties will jointly request real-time reporting
18. The parties will share any courtroom audio-visual equipment and will provide each other electronic versions of whatever they display immediately after the display