**INSTRUCTIONS FOR PREPARATION**

 **This pretrial order should be jointly prepared by all parties. If one party does not participate, the participating party should submit this with the non-participating parties’ contentions blank. All parties and counsel are expected to cooperate in the preparation of the pretrial order. The draft order must be submitted to the Court, by email, in MS Word format no later than 48 hours prior to the scheduled pretrial conference. Failure to timely submit may result in the Pre-Trial Conference being converted to a Status Conference and the trial being continued. All documents required to be filed with the Court Clerk must likewise be filed two business days prior to the scheduled pretrial conference. The proposed order must be submitted to the e-queue of Judge Wonnell in WORD format.**

 **This template is just that, a template. Counsel are not required to use this form, but any proposed pretrial order must cover all of the matters referenced in it. Clearly inapplicable sections may be deleted.**

**You do not, however, need to complete the section setting the trial date. That will be filled in at the pretrial conference.**

 **If the parties are submitting a proposed order that contains language upon which the parties are unable to agree, the Pre-Trial order should clearly reflect both parties’ contentions.**

**IN THE DISTRICT COURT OF JOHNSON COUNTY, KANSAS**

**CIVIL DEPARTMENT**

Click here to enter text. **Case No.** Click here to enter text.

**and Division 6**

Click here to enter text.

**PRETRIAL ORDER**

A final pretrial conference was held on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. The parties submit that the mediation required by the Case Management Order was completed on \_\_\_\_\_\_\_\_\_\_.

1. Appearances.
	1. Petitioner appears in person and with counsel, Click here to enter text..
	2. Respondent appears in person and with counsel, Click here to enter text..
	3. Other Appearances (Guardian ad Litem, Case Manager, CASA volunteer, etc.): Click here to enter text.
2. General Stipulations.
	1. There are no objections to personal jurisdiction over the parties, subject matter jurisdiction and venue except: Click here to enter text.
3. Plaintiff’s Legal Theories
4. Defendant’s Legal Theories
5. Issues of Disputed Fact
6. Issues of Law
7. Witnesses.
	1. Petitioner lists (full name and address) fact witnesses for trial below. Witnesses not listed will not be permitted to testify absent leave of Court. Witnesses to be called solely for rebuttal or impeachment need not be listed. Petitioner’s witnesses: Click here to enter text.
	2. Respondent lists (full name and address) fact witnesses for trial below. Witnesses not listed will not be permitted to testify absent leave of Court. Witnesses to be called solely for rebuttal or impeachment need not be listed. Respondent’s witnesses: Click here to enter text.
	3. Petitioner lists the following previously designated experts for testimony at trial: Click here to enter text.
	4. Respondent lists the following previously designated experts for testimony at trial: Click here to enter text.
	5. The witness exclusion rule will be applied at trial. Witnesses (other than parties) will be excluded from the trial until after their testimony has been completed so that they cannot hear the testimony of other witnesses.
	6. Witnesses listed by one party may be called by the other party. Witnesses not listed as required by this order shall not be permitted to testify absent leave of Court.
8. Exhibits.
	1. Petitioner’s final exhibit list is attached as Attachment Choose an item..
	2. Respondent’s final exhibit list is attached as Attachment Choose an item..
	3. All trial exhibits, together with a final exhibit list, will be marked and exchanged ten days prior to trial. Exchange **must** be electronic. Petitioner’s Exhibits will be marked 1-299. Respondent’s exhibits will be marked 300-599. Third party exhibits will be marked 600-899. Parties must present exhibits in electronic format. Request for paper or tangible exhibit presentation must be made prior to trial.
	4. The following listed exhibits are considered business records under K.S.A. 60-460(m) and are admitted into evidence, but the parties reserve the right to object to the contents of these documents on any other basis, including relevance and hearsay within a document. Click here to enter text..
	5. Copies of exhibits may be used in lieu of originals.
	6. Exhibits listed by one party may be offered by the other party.
	7. The parties have stipulated to the admission of the following exhibits: Click here to enter text..
	8. Exhibits not listed, marked, and exchanged as required by this order, shall not be received into evidence absent leave of Court.
9. Amendments to Pleadings.
	1. Click here to enter text.
10. Pending Motions or Motions Expected to be Filed Prior to Trial.
	1. Petitioner: Click here to enter text.
	2. Respondent: Click here to enter text.
	3. Pending motions: Click here to enter text.
	4. The parties shall submit any motion in limine on or before (21 days prior to Final Argument Conference date). Responses shall be filed on or before (7 days prior to Final Argument Conference date)
	5. Any party wishing to submit a deposition in lieu of live testimony shall file the deposition designation, and basis or reason for why the deposition will be used in lieu of live testimony on or before (21 days prior to Final Argument Conference date). Any response, counter-designation or objection shall be filed by (7 days prior to Final Argument Conference date).
	6. The parties shall file all joint stipulated jury instructions by (21 days prior to the Final Argument Conference date). If a party requests additional jury instructions that are not agreed to, they shall also be filed by (21 days prior to the Final Argument Conference date)
11. Trial.
	1. Trial is scheduled for Click here to enter a date. Beginning at Click here to enter text. for a period of Click here to enter text..
	2. If ordered, Trial Briefs or Proposed Findings of Fact and Conclusions of Law shall be delivered to the Court, with copies to all opposing counsel or unrepresented parties, seven days prior to trial.
12. Settlement Prospects:
13. Procedural or Other Issues.
	1. Click here to enter text.

IT IS SO ORDERED.

*­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

District Court Judge

Submitted by:

[insert attorney signature blocks here]