

**IN THE SUPERIOR COURT OF THE STATE OF DELAWARE
IN AND FOR _____ COUNTY**

| | | |
|---------------|---|----------|
| Plaintiff(s), |) | |
| |) | |
| |) | C.A. No. |
| v. |) | |
| |) | |
| |) | |
| Defendant(s). |) | |

PRETRIAL STIPULATION

- (1) Statement of the Nature of the Action.
- (2) Facts Admitted Without Formal Proof.
- (3) Issues of Fact Any Party Contends Remain to Be Litigated.
- (4) Issues of Law Any Party Contends Remain to Be Litigated.
- (5) Exhibits Admitted Without Objection/Objected to, and Grounds for Objection(s).
- (6) Names and Addresses of all Witnesses and Specialties of Experts to be Called as Witnesses.
- (7) Brief Statement of What Plaintiff Expects to Prove in Support of Claim.
- (8) Brief Statement of Defense.
- (9) Brief Statement of Counterclaimant(s)/Crossclaimant(s).
- (10) Amendments to Pleadings - Unopposed/Opposed and Grounds for Objections.
- (11) Certification of Good Faith Settlement Negotiations.
- (12) Other Matters.
- (13) Special Verdict and/or Interrogatories and Form Proposed.
- (14) Special Voir Dire Questions: Unopposed/Opposed and Reason.
- (15) Life or Work Expectancy of a Person Seeking Future Damages.
- (16) Copies of Proposed Charge with Notations as to Specific Objections and Counterproposals Therefor.
- (17) Trial Time Estimate.

Trial Date:

(18) THIS ORDER SHALL SUPPLEMENT THE PLEADINGS AND GOVERN THE COURSE OF THE TRIAL UNLESS MODIFIED BY THE COURT TO PREVENT MANIFEST INJUSTICE.

Name
Address
Telephone Number
Bar I.D. No.
Attorney for Plaintiff(s)

Name
Address
Telephone Number
Bar I.D. No.
Attorney for Defendant(s)

SO ORDERED this ____ day of _____, _____.

J.