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UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA

In re _____,

Debtor.

_____,
Plaintiff,

v.

_____,
Defendant.

Chapter ____
Case No. _____
Adv. No. _____

JOINT PRETRIAL STATEMENT

(I) Statement of the Case

[A brief statement of the nature of the case, including a reference to relevant sections of the Bankruptcy Code.]

(II) Stipulated Facts

[The uncontested facts the parties deem material.]

1 **(III) Disputed Facts**

2 [Each party shall state their respective positions regarding the disputed
3 factual issues to be determined. Each opposing party shall state whether it
4 contends that the statement is accurate, material and relevant, and why.]

5 **(IV) Agreed Issues of Law**

6 [Agreed issues of law that the parties believe are material to the case,
7 including the elements of each claim and defense.]

8 **(V) Disputed Issues of Law**

9 [A separate statement by each party of disputed issues of law that the party
10 believes to be material.]

11 **(VI) List of Witnesses to be Offered at Trial and Objections**

12 [A list of each party's trial witnesses, including witnesses whose testimony will
13 be presented by declaration or deposition transcript, and a summary of the
14 substance of the witnesses' anticipated testimony. Except for good cause
15 shown, only identified witnesses shall be called at trial. Immediately following
16 the summary of a witnesses' testimony, opposing parties shall set forth the
17 legal basis for any objection to the witness testifying.]

18 **(VII) List of Declarations to be Introduced**

19 [Absent order of the Court, no witness may provide testimony via a
20 declaration unless the witness appears in person at trial and is subject to
21 cross examination.]

22 **(VIII) List of Depositions to be Offered as Direct Testimony**

23 [Identify any depositions to be offered at trial, indicating the specific portions
24 to be offered and the party or parties against whom they will be offered.
25 Immediately following the identity of the deposition portions to be offered,
26 opposing parties shall identify any objections to the use of the deposition
27 and/or designate any requested supplements to the proposed deposition
28 quotations.]

(IX) List of Exhibits to be Introduced

[Each exhibit shall be separately listed. Except for good cause shown, only
exhibits specifically identified shall be used at trial. Immediately following the
identity of the exhibit, opposing parties shall identify any evidentiary

1 objections to the use of any exhibit. Objections should cite to an appropriate
2 rule or other authority and not contain argument.]

3 **(X) Estimated Time for Trial**

4 [The parties estimate of the time necessary for each party to present their
5 case or defense.]

6 **Certification**

7 The undersigned certify that they have:

- 8 (i) Read and understand Local Bankruptcy Rule 7016-1;
9
10 (ii) exchanged all listed exhibits or have made the exhibits available to
11 all other parties for inspection and copying; and,
12 (iii) put in place a mechanism that will permit an efficient, electronic
13 presentation of documents in a legible form.

14 _____
Attorney for Plaintiff

15
16
17 _____
Attorney for Defendant