SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
ASBESTOS LITIGATION

Docket No: MID-L- (AS)

Plaintiff(s),

vs.

Defendant(s).

Civil Action

PRETRIAL INFORMATION EXCHANGE
Pursuant to R. 4:25-7(b)

1. **Brief statement of the nature of the action. (This statement will be read to the jury to briefly describe the nature of the action.)**

2. **A list of all lay and witness experts (including addresses) who may be called in the party's case in chief.**

3. **A list of all trial exhibits. All such exhibits shall be premarked for identification.**

4. **A list of any proposed deposition or interrogatory reading(s) by page and line number or by question number.**

5. **A list of *in limine* motions intended to be made at the commencement of trial.**

6. **A listing of all anticipated problems with regard to the introduction of evidence in each party's case in chief, especially, but without limitation, as to any hearsay problems, and legal argument as to all such anticipated evidence problems.**

7. **Stipulations reached on contested procedural, evidentiary and substantive issues.**

8. **Any special voir dire questions.**

9. **A list of proposed jury instructions.**

10. **A proposed jury verdict sheet.**

11. **All expert reports.**

12. **Length of Trial.**

13. **Scheduling conflicts (holidays, vacations, etc.).**

14. **A proposed schedule setting forth the schedule of the respective witnesses with an indication of the expected duration of testimony.**