

IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
ST JOHNS COUNTY, FLORIDA

CASE NO.: [Click here to enter text.](#)

DIVISION: 57

IN RE THE MARRIAGE OF:

[CLICK HERE TO ENTER TEXT.](#)

PETITIONER

HUSBAND

AND

[CLICK HERE TO ENTER TEXT.](#)

RESPONDENT

WIFE

_____ /

JOINT PRETRIAL STIPULATION

In accordance with the Court's Pre-trial Order of [Click here to enter a date.](#), Counsel for the Petitioner and Counsel for the Respondent held a Joint Final Pre-Trial Conference and report the following to the Court in preparation for trial scheduled on [Click here to enter a date.](#)

a) A statement of facts which are admitted and which of those admitted facts may be read in evidence at trial as a stipulation of the parties.

- (1) First item.
- (2) Second item etc..

b) A list of issues raised by the pleadings which are abandoned.

- (1) First item.
- (2) Second item etc..

c) A list of the issues of fact to be tried. If attorney's fees are sought, Counsel certify they have been advised to read and review Rule 4-1.5, Rules Regulating Florida Bar; Florida

Statutes §61.16; *Rosen v. Rosen*, 696 So.2d 697 (Fla. 1997); *Canakaris v. Canakaris*, 382 So.2d 1197 (Fla. 1980); *Naugle v. Naugle*, 632 So.2d 1146 (Fla. 5th DCA 1994) and *Abernethy v. Abernethy*, 638 So.2d 160 (Fla. 5th DCA 1994) and are prepared to try the matter accordingly.

- (1) First item.
- (2) Second item etc..

d) A list of significant issues of law, procedure or evidence, if any, to be determined by the Court prior to or during trial.

- (1) First item.
- (2) Second item etc..

e) The annotated copy of each party’s **actual** list of exhibits showing objections required by the Pretrial Order.

Exhibit Identification	Description	Objection
Husband A		
Husband B		
Husband C		
Wife A		
Wife B		
Wife C		
If you need more cells, place your cursor to the left of the circle star symbol “⦿” at the far right end of the cell where you want to add a row and hit enter key.		

f) The annotated copy of each party’s witness list as required by the Pretrial Order.

Witness Name	Party	Expert/Non Expert	Objection

g) Equitable Distribution Worksheet: The parties shall jointly prepare an equitable distribution spreadsheet. This Division adopted the spreadsheet originally created by The Honorable Diana Tennis shall be prepared by each party to state the following:

(1) Each party's list of alleged "marital" assets, suggested valuations for each asset (real, personal and intangible property), suggested distribution for each pursuant to Fla. Stat § 61.075. and proposed brief factual findings in support of each asset's distribution.

(2) List of all assets claimed to be "nonmarital" together with suggested valuation and brief statement in support of claim.

(3) List of all vested and nonvested benefits, rights or funds as (retirement plans/ stock options etc) defined by Fla. Stat § 61.076, and suggested distribution for each plan.

(4) List of all liabilities, designating each as "marital" or "nonmarital" and stating amount and name of creditor.

(5) List any asset which shall be asserted either as a claim for unequal distribution of marital property and resolved by the factors set forth in subsection (1) or as a claim of enhancement in value or appreciation of non-marital property; stating the extent of the claim and a brief explanation in support of it.

h) If there are minor children, the following shall be provided:

(1) A Parenting Plan outlining time-sharing with minor child(ren), even when time-sharing is not in dispute. The Parenting Plan must be developed and agreed to by the parents and approved by the court. (Supreme Court approved form available at www.flcourts.org) If the parties cannot agree to a Parenting Plan, or if the parents agreed to a plan that is not approved by the court, a Parenting Plan will be established by the court.

(2) A proposed completed child support guideline worksheet calculated in accordance with Section 61.30, Florida Statutes. If the parties do not agree then each shall submit a proposed worksheet.

i) In accordance with Fla. Stat. § 61.13, and controlling law, Shared Parental Responsibility shall be ordered unless the Court finds it will be detrimental to the child. If "Sole

Parental Responsibility” will be sought by either party, a brief factual basis supporting it shall be stated in the Pre-Trial Statement.

j) Any other matters upon which the parties agree.

The parties and counsel, by their signatures below, hereby certify they have met and discussed the matters contained herein, that they are bound by the assertions made herein, and that they are ready for trial.

Petitioner

Date

Counsel for Petitioner

Date

Respondent

Date

Counsel for Respondent

Date