

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN DIEGO  
DEPARTMENT 70 – HONORABLE CAROLYN M. CAIETTI

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**TRIAL REQUIREMENTS**

Please call the Courtroom Clerk (619) 450-7070 before 10:00 a.m. on the day before trial call to report: 1) readiness for trial; 2) the estimated trial length; and 3) whether a jury will be required.

**The Court requires counsel bring to the Friday Trial Call a Joint Trial Notebook comprised of the following:**

1. Table of contents;
2. Joint Trial Readiness Report;
3. Operative pleadings (i.e. complaint, answer);
4. Copy of trial briefs;
5. Copies of Motions in Limine, Oppositions in order (motion followed by opposition), with an index of the motions;
6. Joint witness list with a short sentence describing the witness (i.e. "Dr. Joe Smith, an internist from Mercy Hospital");
7. Joint exhibit list (follow grid format – see link on Dept. 70 web page);
8. Joint statement of the case (if not in Joint Trial Readiness Report);
9. Proposed Voir Dire questions counsel want the Court to ask;
10. Jury instructions – joint packet of instructions in sequential order with objections identified with post-it note on the instruction indicating who opposes the instruction and the basis for the objection;
11. Special Verdict Form – either an agreed upon form or each side's proposed Special Verdict Form. The form should follow CACI as closely as possible and include all cause of actions and all parties. It should be complete and on pleading paper without firm name; and
12. Email the clerk prior to trial call in a Word format a copy of Joint Exhibit List, Joint Witness List, and the index of the Motions in Limine. You will be provided the email address at the trial readiness conference.

Note on Exhibits: Eliminate duplicative exhibits. If exhibits are duplicative, the first exhibit used will be the official numbered exhibit for the balance of the trial. Exhibits should be individually marked. If an exhibit is multi-paged, BATES stamp/paginate the individual pages. If you are submitting photographs, each photograph must have an individual exhibit number.

**In addition, the following are due the day trial commences:**

1. Two sets of exhibits binders, (original for witnesses, pre-marked with Court Exhibit tags, and one set for the Court);
2. Copies of original deposition transcripts that will be used during trial (and any changes made by witness);
3. Three copies of the Joint Witness List;
4. Three copies of the Joint Exhibit List; and
5. Three copies of index of Motions in Limine.