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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America

Plaintiff,

v.

,

Defendant(s).

No. CR

JOINT PRETRIAL MEMORANDUM

Following is the Joint Pretrial Memorandum to be considered at the Final Pretrial Conference in this case set for _____ at _____.

A. Trial Counsel

Provide the mailing address, email address, office number, and cell number for:
Plaintiff(s):
Defendant(s):

B. Counts

1. Identify all counts contained in the indictment (or superseding indictment) that will be tried by jury;
2. Identify all counts, if any, in the indictment (or superseding indictment) that have been dismissed; and
3. Identify all counts, if any, the government intends to dismiss before trial.

C. Forfeiture Allegations

1. Identify any forfeiture allegation contained in the indictment (or superseding indictment), whether any forfeiture allegation in the indictment (or superseding

indictment) has been dismissed, or whether the government intends to dismiss any forfeiture allegation in the indictment (or superseding indictment) before trial.

2. Identify, where applicable, the status of any pending related civil forfeiture proceeding, and whether the issue of forfeiture shall be determined by jury verdict or by the Court if a guilty verdict is returned by the jury.

D. Notices

Identify all Notices of the Government's Intent to Use Evidence.

E. Motions in Limine

Identify all pending motions in limine.

F. Other Motions

Identify all pending motions (other than motions in limine).

G. Stipulations

Identify and describe any stipulation that may be read or otherwise presented to the jury and treated as having been proved at trial.

H. Numbers of Witnesses and Exhibits

Identify the approximate number of witnesses to be called and exhibits to be offered at trial.

I. Estimated Length of Trial

Propose the estimated amount of time to be allocated for each stage of trial as follows:

___ hours: Jury Selection
___ hours: Opening Statements*
___ hours: Government's Case (including rebuttal)
___ hours: Defendant's Case
___ hours: Closing Arguments*
___ hours: Total

* If there is more than one defendant, provide an estimate of time for each one.

1 **J. Interpreter**

2 State whether an interpreter will be needed at trial.

3 **K. Special Equipment Needs.** State whether the parties will need any special
4 audiovisual (or other) equipment at trial.

5 **L. Procedures for Expediting Trial**

6 Discuss and report on all available procedures that might be used to expedite trial,
7 including but not limited to: (1) using summary exhibits in place of voluminous
8 documentary evidence; (2) stipulations on authenticity and foundation; (3) presenting
9 direct expert testimony through summary or written reports; and (4) using the courtroom
10 technology to expedite the presentation of evidence. The parties are invited to email to
11 Robert_Vasquez@azd.uscourts.gov to arrange a time to visit the courtroom and examine
12 its technology. Information about courtroom technology can also be found at
13 www.azd.uscourts.gov under Judges' Information → Orders, Forms & Procedures →
14 Standard Procedures Used by All Phoenix Judges; Electronic/Video Courtroom Equipment
15 Information – Phoenix.

16 **M. Additional Documents**

17 The stipulated joint statement of the case, master witness list, proposed forms of
18 verdict, proposed jury instructions, and juror questionnaire must be filed in accordance
19 with the instructions contained in the order setting Final Pretrial Conference.

20
21 _____
22 Attorney for United States

Attorney for Defendant(s)