**JOINT EXHIBIT LIST**

As explained in Judge Perry’s Standing Order Governing Proposed Pretrial Orders, the parties must use this template to submit a numbered list of exhibits with the following information: (a) the exhibit number; (b) the date of the document or exhibit, if applicable; (c) a concise, neutral description of the exhibit; (d) a concise statement of the exhibit’s relevance; and (e) whether there is an objection to the exhibit’s admission, and if so, a concise explanation of the objection and the proponent’s theory of admissibility. Parties must list all bases for supporting or opposing the admission of an exhibit, ***except for foundation and authentication***. Unless the parties stipulate to an exhibit’s admissibility, a party must be prepared to properly lay foundation and authenticate all exhibits at trial, and a party need not state these objections to preserve them. Other objections, however, may be waived if not included below, but a party need not do more than identify the grounds and legal authority for its position. The parties must also edit the header to include the case information and date they have submitted or updated the joint exhibit list. It must be submitted to the Court’s proposed order inbox in Microsoft Word format.

The parties are to use the table below (and any additional rows needed) to input this information in the following order: (a) all joint exhibits; (b) all exhibits of plaintiff(s); (c) all exhibits of defendant(s). Exhibits must be numbered as explained in the Court’s Jury Evidence Recording System (JERS) procedure. The numbers of exhibits ***must not be changed*** even if the Court excludes exhibits or a party withdraws exhibits. In the event that the Court gives a party leave to add exhibits the joint exhibit list is submitted, those exhibits numbers will continue from the end of that party’s list.

The parties are encouraged not to edit the formatting settings of the chart below and if they are copying and pasting material into the chart, to paste as plain text or to keep the destination formatting. An exception is that the text size may be reduced to no smaller than 10-point font if necessary to fit text in a manageable space. If the parties’ formatting makes it cumbersome to use the chart, the Court may require the parties to resubmit the chart. *These instructions can be deleted as the parties prepare their joint exhibit list, as can the example row included below*.

| **No.** | **Date** | **Description** | **Relevance** | **Objection** |
| --- | --- | --- | --- | --- |
| PX1 | 02/15/06 | 2005 Performance Review | Proves record of satisfactory job performance | R. 402 relevance; R. 403 confusion. Plaintiff fired in 2011. |
|  |  |  |  |  |