



**MAGISTRATE JUDGE SHEILA FINNEGAN**  
219 South Dearborn Street  
Courtroom 2214  
Chambers 2206  
Chicago, IL 60604  
(312) 435-5657

**FINAL PRETRIAL ORDER**  
**FOR CONSENT CASES BEFORE MAGISTRATE JUDGE FINNEGAN**

In all civil jury trials, the parties shall jointly prepare and file a final pretrial order on the date set by Judge Finnegan. The final pretrial order (including the Court's courtesy copy in a binder) must include the following items:

1. **Jurisdiction:**

A statement of the basis alleged for the Court's jurisdiction and, if jurisdiction is disputed, the nature and basis of the dispute.

2. **Trial Attorneys:**

A list of the attorneys trying the case, including business and cell phone numbers and email addresses.

3. **Case Statement:**

A concise agreed statement of the case, including the claims, counterclaims and cross-claims. This statement will be read to the jury during *voir dire*.

4. **Relief Sought:**

An itemization of damages and other relief sought.

5. **Stipulations:**

A statement of any stipulations reached by the parties.

6. **Witness Lists:**

Separate lists for plaintiff and defendant providing the names of witnesses, including expert witnesses, divided into the following three categories: (a) witnesses who **will** be called to testify at trial; (b) witnesses who **may** be called to testify at trial; and (c) witnesses whose testimony a party will present by deposition or other prior testimony (indicating whether the presentation will be by transcript or video). The Court will read these lists to the jury during *voir dire*.

Any witness not listed in the final pretrial order will be precluded from testifying absent a showing of good cause, except that each party reserves the right to call such rebuttal witnesses (who are not presently identifiable) as may be necessary.

a. **Objections.** A statement of any objections to the calling of any witness, including expert witnesses. Objections not made in the final pretrial order will be deemed waived absent a showing of good cause. If the objection is the subject of a motion *in limine*, the pretrial order may simply refer to the motion and need not repeat the grounds stated in the motion.

b. **Depositions.** For each witness whose depositions will be used, provide the following information if the Court will be called upon to rule on objections: (a) a listing, by page and line, of the testimony that each side seeks to present; (b) a concise statement of objections to any testimony and the basis for the objection; and (c) a concise statement of the asserted basis of admissibility. Objections not made in the final pretrial order will be deemed waived absent a showing of good cause. *A copy of the deposition (preferably electronic) is to be provided on the same day as the final pretrial order.*

7. **Exhibits:**

A schedule of all exhibits a party may introduce at trial, as well as any demonstrative exhibits or evidence, identified by trial exhibit number, with a brief description of each exhibit. Any exhibit not listed in the final pretrial order will be excluded from evidence absent a showing of good cause.

a. **Objections.** A statement of any objections to each exhibit. Objections not made in the final pretrial order will be deemed waived absent a showing of good cause.

b. **Copies for Court.** A bench book of each party's exhibits is to be delivered to the Court at or before the start of trial.

8. **Proposed Voir Dire Questions:**

Judge Finnegan requires prospective jurors to complete a written questionnaire, samples of which are available on her website and which vary somewhat

depending on the issues in the case. Counsel will be given copies of the completed questionnaires before jury selection begins. Judge Finnegan will also pose additional *voir dire* questions in open court that are not suitable for the questionnaire. The parties should assume that the “general” questions typically used on the sample questionnaire will be asked and should not duplicate them in the final pretrial order. Rather, the parties should focus their attention on areas of questioning that are specific to the case that they would like included in the questionnaire or asked in open court. If any question proposed by an opposing party is objected to, the objection should be noted in the pretrial order.

9. **Jury Instructions:**

Proposed jury instructions in Word are to be included both in the written pretrial order and in electronic form (either emailed to the Proposed Order Box or provided on a thumb drive or CD).

a. Agreed Instructions. The parties are directed to confer and agree upon jury instructions to the extent possible. Agreed proposed instructions should be marked as such and shall be numbered consecutively.

b. Disputed Instructions. Unagreed proposed instructions shall be numbered, shall identify the proponent of the instruction, and shall include supporting authority. Objections to any proposed instructions must be set forth in writing and shall include supporting authority.

10. **Trial Briefs:**

The Court does not require trial briefs. Any party who wishes to file a trial brief must seek leave of the Court to do so.

**ENTER:**

**SHEILA FINNEGAN  
United States Magistrate Judge**