

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court Department

Bristol Division

Docket No: _____

Plaintiff/Petitioner

vs.

Defendant/Respondent

Counsel for Plaintiff/Petitioner

vs.

Counsel for Defendant/Respondent

PRE-TRIAL MEMORANDUM
of

☐ Plaintiff/Petitioner ☐ Defendant/Respondent ☐ Joint (both parties)

Complaint/Petition: _____ Filed on: _____

Part A: Date and Time of Pre-Trial Meeting

☐ The parties met and talked in person on _____ at _____ AM/PM

☐ The parties have not met as ordered in the pre-trial notice and order, because _____, or

☐ A 209A Abuse Prevention Order is presently in effect in the _____ Court

☐ A 208 Protective Order is presently in effect

Part B: Statement of Uncontested Facts

☐ We were married on: _____

☐ We were divorced on: _____

☐ We were never married

☐ Our children are:

_____ born: _____

_____ born: _____

_____ born: _____

☐ Other uncontested facts are:

☐ The current Court order(s) that is/are relevant to this Complaint is/are as follows:

(List date, and summary)

Part C: Statement of Contested Facts

- | | |
|--|--|
| <input type="checkbox"/> Grounds for divorce | <input type="checkbox"/> Tax Exemption(s) |
| <input type="checkbox"/> Adjudication of: _____ | <input type="checkbox"/> College Expenses |
| <input type="checkbox"/> Custody | <input type="checkbox"/> Alimony |
| <input type="checkbox"/> Parenting Time | <input type="checkbox"/> Division of Marital Assets |
| <input type="checkbox"/> Transportation for Parenting Time | <input type="checkbox"/> Division of Marital Debts |
| <input type="checkbox"/> Health Insurance for: _____ | <input type="checkbox"/> Guardianship of Minor/IP/PP |
| <input type="checkbox"/> Uninsured Medical Expenses for: _____ | <input type="checkbox"/> Removal of child(ren) from Commonwealth |
| <input type="checkbox"/> Other contested issues: | |

Progress toward agreement:

Part D: Discovery

- ☐ Discovery is complete
- ☐ There is no need for Discovery at this time
- ☐ Discovery is not complete because

- ☐ Discovery will be completed by

Part E: Witness List

Please list each 1) proposed witness, 2) his or her relationship or role in this proceeding, (for example: sister of the plaintiff, children's dentist) and 3) a brief statement as to how his or her testimony will relate to the issues to be heard.

1. _____
2. _____
3. _____
4. _____
5. _____

Part F. List of Exhibits

1. _____
2. _____
3. _____
4. _____
5. _____

Part G: Depositions

List deposition intended for use at trial, see *Massachusetts Rules of Domestic Relations Procedure, Rules 27 through 37*.

1. _____
2. _____
3. _____

Part H: Estimated time needed for Trial

- ☐ No uncontested facts
- ☐ Estimated time needed for trial _____ minutes /hour(s)

Part I: Financial Statements

- ☐ Financial statements filed by
- ☐ Plaintiff / dated: _____
- ☐ Defendant/dated: _____

Plaintiff date

Defendant date

Counsel for Plaintiff date

Counsel for Defendant date