

IN THE CIRCUIT COURT FOURTH  
JUDICIAL CIRCUIT IN AND FOR  
CLAY COUNTY, FLORIDA

CASE NO.: \_\_\_\_-DR-\_\_\_\_\_  
DIVISION: E

**IN RE: The Marriage of:**

\_\_\_\_\_  
\_\_\_\_\_,  
and \_\_\_\_\_  
\_\_\_\_\_.  
\_\_\_\_\_ /

**PRETRIAL STIPULATION**

**PURSUANT** to Order Setting this case for Pretrial Conference and Trial, counsel for the parties met and stipulated as follows: (add extra pages if needed)

1. Appearances
  - A. Wife, \_\_\_\_\_, Age \_\_\_\_, Counsel \_\_\_\_\_
  - B. Husband, \_\_\_\_\_, Age \_\_\_\_, Counsel \_\_\_\_\_
2. Type of proceedings (e.g: original dissolution of marriage; modification; paternity, etc.)

\_\_\_\_\_  
\_\_\_\_\_

3. Date of marriage: \_\_\_\_\_

4. Date of separation: \_\_\_\_\_

5. Names, ages, and birth dates of children born (if any):
- \_\_\_\_\_, born \_\_\_\_\_, age \_\_\_\_\_

6. Children presently reside with:

\_\_\_\_\_ Wife/Mother

\_\_\_\_\_ Husband/Father

\_\_\_\_\_ Other: \_\_\_\_\_

7. Children First In Divorce Course Completed by:

Mother/Wife \_\_\_\_ Yes, \_\_\_\_ No; Father/Husband \_\_\_\_ Yes, \_\_\_\_ No

8. Issue as to primary residential parent? \_\_\_\_ Yes, \_\_\_\_ No

9. Shared Parental Responsibility:

\_\_\_\_ Parties agree; \_\_\_\_ Sole parental responsibility sought by

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10. Visitation issue: \_\_\_\_ Non-Structured; \_\_\_\_ Structured

Indicate requested structure by each party, if in controversy:

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11. Employment:

A. (a) Husband employed by \_\_\_\_\_ and earns

\$ \_\_\_\_\_ gross; \$ \_\_\_\_\_ net; per \_\_\_\_\_

(b) All retirement plans \_\_\_\_\_

\_\_\_\_\_ and

the number of years in each plan: \_\_\_\_\_.

B. (a) Wife employed by \_\_\_\_\_ and earns

\$ \_\_\_\_\_ gross; \$ \_\_\_\_\_ net; per \_\_\_\_\_

(b) All retirement plans \_\_\_\_\_

\_\_\_\_\_ and

the number of years in each plan: \_\_\_\_\_.

12. Child Support:

A. Amount paid per week during pendency of suit:

\$ \_\_\_\_\_ Voluntarily; \$ \_\_\_\_\_ Temporary award/date \_\_\_\_\_

B. Total support sought per week/month: \$ \_\_\_\_\_

C. Support offered per week/month: \$ \_\_\_\_\_

D. (a) Medical and dental insurance to be paid by:

\_\_\_\_\_ Wife/Mother, \_\_\_\_\_ Husband/Father, \_\_\_\_\_ In Controversy

(b) Is insurance provided by either party's employer:

\_\_\_\_\_ Wife/Mother, \_\_\_\_\_ Husband/Father

E. Costs of medical and dental expenses not covered by insurance to be paid

by:

\_\_\_\_\_ Wife/Mother, \_\_\_\_\_ Husband/Father, \_\_\_\_\_ Shared by parties,

\_\_\_\_\_ In controversy

F. Additional special circumstances suggesting from guidelines: \_\_\_\_\_

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G. Guidelines support amount: \$ \_\_\_\_\_

13. What life insurance is presently available to each party?

\_\_\_\_\_ Wife/Mother, \_\_\_\_\_ Husband/Father

14. Alimony:

A. \_\_\_\_\_ Neither party seeks alimony in any form.

B. \_\_\_\_\_ Party seeks permanent periodic alimony in the amount of \$ \_\_\_\_\_.

C. \_\_\_\_\_ Party seeks rehabilitative alimony in the amount of \$ \_\_\_\_\_ for  
\_\_\_\_\_ years.

D. \_\_\_\_\_ Party seeks lump sum alimony in the amount of \$ \_\_\_\_\_

Reasons for request: \_\_\_\_\_

E. Spouse's position on alimony request, if any:

\_\_\_\_\_

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15. Marital Personal property: \_\_\_\_\_ resolved, \_\_\_\_\_ unresolved

Property in controversy: \_\_\_\_\_

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NOTE: If the issue of personalty is not settled prior to final hearing, each party shall submit to the Court a list of assets sought by each party, stating the specific description of such asset, the nature of the party's interest, the amount of debt encumbering any asset (i.e., lien balance), and the fair market value or present balance of such asset. ATTACH LIST TO PRE-TRIAL STIPULATION.

16. Marital real property:

A. Marital home is located at \_\_\_\_\_  
valued at \$\_\_\_\_\_, with \$\_\_\_\_\_ in  
encumbrances. Home titled in \_\_\_\_\_ name(s) and  
occupied by \_\_\_\_\_.

17. Any non-marital assets or special equity? \_\_\_\_\_ Yes, \_\_\_\_\_ No

A. Non-marital assets or special equity claimed by Husband:

\_\_\_\_\_  
\_\_\_\_\_

B. Non-marital assets or special equity claimed by Wife:

\_\_\_\_\_  
\_\_\_\_\_

C. Other real property (legal description) or tangible or intangible or marital debts. List the value of each and the proposed distribution. (Attach separate list, if necessary, and describe any dispute as to appropriate date of valuation.)

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18. Other pending issues: \_\_\_\_\_

19. Witnesses and nature of testimony (other than parties and residential witnesses):

A. Wife: \_\_\_\_\_

B. Husband: \_\_\_\_\_

NOTE: Counsel shall discuss all witnesses and testimony prior to final hearing for agreement on admission without objection of introductory, cumulative, and uncontroverted testimony, which can be read into record at final hearing.

20. Exhibits:

A. Mandatory UP-TO-DATE Financial Affidavits of each of the parties.

B. Wife (other exhibits): \_\_\_\_\_

C. Husband (other exhibits): \_\_\_\_\_

NOTE: Counsel shall review all exhibits prior to final hearing and agree, where reasonable, to admission thereof without objection.

21. The parties make the following additional stipulations:

22. Attorney's fees and court costs sought by:

\_\_\_\_\_ Wife, \_\_\_\_\_ Husband

A. \_\_\_\_\_ Issue to be reserved for consideration subsequent to final hearing.

B. \_\_\_\_\_ Issue to be heard at trial by affidavit or by testimony.

NOTE: All parties seeking attorney's fees at the time of final hearing or subsequent thereto must file a verified statement as to the manner of time spent, along with a detailed list of costs.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Attorney for Husband or  
Husband in proper person

\_\_\_\_\_  
Attorney for Wife or  
Wife in proper person