{%p if case.juris.jurisdiction.name.text == ‘federal’ %}

{{r case.fed\_head() | inline\_markdown }}

{{r case.doc\_header() | inline\_markdown }}

|  |  |
| --- | --- |
| {{p include\_docx\_template(‘prod\_caption1.docx’) }} | {{ case.number() }}  **{{ case.document\_title() }}** |
| {%tr if case.has\_cross\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption3.docx’) }} |  |
| {%tr endif %} |  |
| {%tr if case.has\_third\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption2.docx’) }} |  |
| {%tr endif %} |  |

{%p elif case.juris.state.name.text == "AZ" %}

{{r case.fed\_head() | inline\_markdown }}

{{r case.doc\_header() | inline\_markdown }}

|  |  |
| --- | --- |
| {{p include\_docx\_template(‘prod\_caption1.docx’) }} | {{r case.jurisdiction\_docx()[0] | inline\_markdown }} |
| {%tr if case.has\_cross\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption3.docx’) }} |  |
| {%tr endif %} |  |
| {%tr if case.has\_third\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption2.docx’) }} |  |
| {%tr endif %} |  |

{%p elif case.juris.state.name.text == "CA" %}

{{r case.fed\_head() | inline\_markdown }}

{{r case.doc\_header() | inline\_markdown }}

|  |  |
| --- | --- |
| {{p include\_docx\_template(‘prod\_caption1.docx’) }} | {{r case.jurisdiction\_docx()[0] | inline\_markdown }} |
| {%tr if case.has\_cross\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption3.docx’) }} |  |
| {%tr endif %} |  |
| {%tr if case.has\_third\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption2.docx’) }} |  |
| {%tr endif %} |  |

{%p elif case.juris.state.name.text == “NJ" %}

{{r case.fed\_head() | inline\_markdown }}

{{r case.doc\_header() | inline\_markdown }}

|  |  |
| --- | --- |
| {{p include\_docx\_template(‘prod\_caption1.docx’) }} | {{r case.jurisdiction\_docx()[0] | inline\_markdown }} |
| {%tr if case.has\_cross\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption3.docx’) }} |  |
| {%tr endif %} |  |
| {%tr if case.has\_third\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption2.docx’) }} |  |
| {%tr endif %} |  |

{%p elif case.juris.state.name.text == “CO” %}

{{p include\_docx\_template(‘CO.docx’) }}

{%p elif case.juris.state.name.text == “NC” %}

{{p include\_docx\_template(‘NC.docx’) }}

{%p elif case.juris.state.name.text == “WI” %}

{{p include\_docx\_template(‘WI.docx’) }}

{%p elif case.juris.state.name.text == “RI” %}

{{p include\_docx\_template(‘RI.docx’) }}

{%p elif case.juris.state.name.text == “TX” %}

{{p include\_docx\_template(‘TX.docx’) }}

{%p elif case.juris.state.name.text == “FL” %}

{{p include\_docx\_template(‘FL.docx’) }}

{%p elif case.juris.state.name.text == “IN” %}

{{p include\_docx\_template(‘IN.docx’) }}

{%p elif case.juris.state.name.text == “MN” %}

{{p include\_docx\_template(‘MN.docx’) }}

{%p elif case.juris.state.name.text == “NY” %}

{{p include\_docx\_template(‘NY.docx’) }}

{%p elif case.juris.state.name.text == “NM" %}

{{p include\_docx\_template(‘NM.docx’) }}

{%p elif case.juris.state.name.text == “WY” %}

{{p include\_docx\_template(‘WY.docx’) }}

{%p elif case.juris.state.name.text == “SC” %}

{{p include\_docx\_template(‘SC.docx’) }}

{%p elif case.juris.state.name.text == “SD” %}

{{p include\_docx\_template(‘SD.docx’) }}

{%p elif case.juris.state.name.text == “UT” %}

{{r case.fed\_head() | inline\_markdown }}

{{p include\_docx\_template(‘UT.docx’) }}

{%p elif case.juris.state.name.text == “WV” %}

{{p include\_docx\_template(‘WV.docx’) }}

{%p else %}

{{r case.doc\_header() | inline\_markdown }}

|  |  |
| --- | --- |
| {{p include\_docx\_template(‘prod\_caption1.docx’) }} | {{r case.jurisdiction\_docx()[0] | inline\_markdown }}  {%p if case.draft == "Motion to Amend to Allege Punitive Damages" %}  *ORAL ARGUMENT REQUESTED WITHIN 30 DAYS PER ORS 31.725*  {%p endif %} |
| {%tr if case.has\_cross\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption3.docx’) }} |  |
| {%tr endif %} |  |
| {%tr if case.has\_third\_parties() %} |  |
| {{p include\_docx\_template(‘prod\_caption2.docx’) }} |  |
| {%tr endif %} |  |

{%p if case.juris.state.name.text in ("AL", "AK", “AR”, "OH", "GA", "IL", "IN", "KS", "MD", "MO", "OH", "OK", "PA", "RI", "TN", “VA", "WV", "WY") %}

**{{ case.jurisdiction\_docx()[1] }}**

{%p endif %}

{%p endif %}

{%p if case.draft not in (‘Trial Memo’, ‘Summons’, ‘Motion’, ‘Order’, ‘Declaration’, 'Notice of New Firm’, ‘ProposeJuryInstructions’) %}

{{r case.dear\_recipients() | inline\_markdown }}

{{r case.response\_intro() | inline\_markdown }}

{%p endif %}

{%p if case.draft == ‘Summons’ %}

{{p include\_docx\_template(‘Summons.docx’) }}

{%p elif case.draft == "Declaration" %}

{{p include\_docx\_template(‘postponer.docx’) }}

{%p elif case.draft == "ProposeJuryInstructions" %}

{{p include\_docx\_template(‘proposed\_instructions.docx’) }}

{%p elif case.draft == "Motion to Amend to Allege Punitive Damages" %}

{{p include\_docx\_template(‘MTA.docx’) }}

{%p elif case.draft == 'Discovery Response' %}

{{p include\_docx\_template(‘RROG\_maker.docx’) }}

{%p elif case.draft == 'Notice of New Firm’ %}

{{p include\_docx\_template(‘Notice\_New\_Firm.docx’) }}

{%p elif case.draft == 'Depo Notice' %}

{%p if case.pmk %}

{%p for bullet in case. pmk\_bullets() %}

1. {{ bullet }}

{%p endfor %}

{%p endif %}

{%p if case.remote\_depo %}

|  |  |
| --- | --- |
| **PERSON TO BE EXAMINED:** | {{ comma\_and\_list(case.recipients()) }} |
| **DATE AND TIME OF DEPOSITION:** | {{ format\_date(case.proposed\_depo\_date) }}  {%p if case.proposed\_depo\_time %}  {{ format\_time(case.proposed\_depo\_time) }}  {%p endif %} |
| **PLACE OF DEPOSITION:** | {{ case.depo\_location.name.text}}  {{ case.depo\_location.address.block() }} |
| **COURT REPORTER:** | {{ case.court\_reporter.name.text }}  {%p if case.court\_reporter.phone %}  {{ phone\_number\_formatted(case.court\_reporter.phone) }}  {%p endif %} |

**PLEASE TAKE FURTHER NOTICE** that:

1. {%p for notice in case.remote\_depo\_notices() %}
2. {{ notice }}
3. {%p endfor %}

{%p endif %}

{{ case.depo\_outro() }}

{%p elif case.draft == 'Trial Memo' %}

# STATEMENT OF FACTS

# ISSUES BEFORE THE JURY

# EVIDENTIARY ISSUES

{%p for topic in case.facite\_trial\_memo() %}

1. **{{ topic[0] }}**

{{ topic[1] }}

{%p endfor %}

{%p elif case.draft == 'Witness List' %}

1. {%p for witness in case.lay\_witnesses %}
2. {{ witness }}
3. {%p endfor %}

{{ case.witness\_list\_outro }}

{%p elif case.draft == 'MIL' %}

{%p for motion in case.facite\_motions\_in\_limine() %}

1. **{{ motion[0] }}**

{{r motion[1] | inline\_markdown }}

{%p endfor %}

{%p elif case.draft == 'ROG' %}

{%p elif case.draft =='RFA' %}

{%p elif case.draft == 'RFP' %}

{{p include\_docx\_template(‘RFP\_maker.docx’) }}

{%p endif %}

{%p if case.draft not in (‘Complaint’, ‘Summons’, ‘Motion’, ‘Order’, ‘Declaration’) %}

|  |
| --- |
| Dated: April 11, 2023. |
| {{ case.user\_firm() | upper }}  By: |
| {%p for atty in case.user\_house() %}  {{ atty }}, {{ atty.bar() }}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(case.colawyers().as\_noun('attorney')) }} for {{ case.user\_clientlist().asnoun() }}  Trial {{ capitalize(case.colawyers().as\_noun('attorney')) }}: Same |
| {%tr for pair in case.cofirms() %} |
| {{ pair | upper }}  By: |
| {%p for atty in case.attorneys\_for(pair) %}  {{ atty }}, {{ atty.bar() }}  {%p if atty.pro\_hac\_vice() %}  *pro hac vice*  {%p endif %}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(case.colawyers().as\_noun('attorney')) }} for {{ case.user\_clientlist().asnoun() }}  Trial {{ capitalize(case.colawyers().as\_noun('attorney')) }}: Same |
| {%tr endfor %} |

**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2023, I served the foregoing {{ case.document\_title() }} on {{ case.recipients\_attorneys().as\_noun(‘attorney’) }} for {{ case.recipients().asnoun() }} at the address{% if case.recipients() | length >=2 %}es{% endif %} below and by the following indicated method or methods:

|  |
| --- |
| {%tr for group in case.certificate\_of\_service\_list() %} |
| {%p for firm in group[0] %}  {%p for attorney in case.attorneys\_who\_work\_at(firm) %}  {{ attorney.salutation() }} {{ attorney.name.full() }}  {{ attorney.email }}  {%p endfor %}  {{ firm.name.text | upper }}  {{ firm.address.block() }}  {%p endfor %}  *{{ group[1].as\_noun(“Attorney”) }} for {{ group[2].asnoun() }} {{ group[2] }}* |
| {%tr endfor %} |

X By serving through **OJD File & Serve** if said attorney(s) were registered for such service on the date set forth below. If said attorney(s) were not registered for service through OJD File & Serve, then by:

**Mail** in sealed, first-class postage-prepaid envelopes, addressed to the attorney as shown above, the last-known office addresses of the attorney, and deposited with the United States Postal Service at {{ case.user\_firm().address.city }}, {{ case.user\_firm().address.state }}, on the date set forth below.

**Hand-delivery** to the attorneys of record at the courthouse, their office or current place of business on the date set forth below.

**Fax** to the attorneys at the fax numbers shown above, which are the last-known fax numbers for the attorneys’ offices, on the date set forth below.

X **E-mail** to the attorneys at the e-mail addresses shown above, which are the last-known e-mail addresses for the attorneys’ offices, on the date set forth below.

|  |
| --- |
| Dated: April 11, 2023. |
| {{ case.user\_firm() | upper }}  By: |
| {%p for atty in case.user\_house() %}  {{ atty }}, {{ atty.bar() }}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(case.colawyers().as\_noun('attorney')) }} for {{ case.user\_clientlist().asnoun() }}  Trial {{ capitalize(case.colawyers().as\_noun('attorney')) }}: Same |
| {%tr for pair in case.cofirms() %} |
| {{ pair | upper }}  By: |
| {%p for atty in case.attorneys\_for(pair) %}  {{ atty }}, {{ atty.bar() }}  {%p if atty.pro\_hac\_vice() %}  *pro hac vice*  {%p endif %}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(case.colawyers().as\_noun('attorney')) }} for {{ case.user\_clientlist().asnoun() }}  Trial {{ capitalize(case.colawyers().as\_noun('attorney')) }}: Same |
| {%tr endfor %} |

{%p endif %}