Para. 99

# **Lead Counsel's Statement On Trial Proceedings**

| Suit No.:  |   |
|--|---|
| Case Name:   |   |
| PART ONE: ESTIMATION O                                       | OF NO. OF TRIAL DAYS  |
| To be filled in by Lead Counsel                              | for the Parties   |
| Party Type (e.g., Claimant,<br>Defendant, Third Party, etc.) |   |
| Law Firm of Party  |   |
| Number of Witnesses to be called by Party                    | Factual:  |
|  | Expert:   |
|  | Have any of the AEICs of your witnesses been dispensed with by order of court? Yes / No*    |
|  | If yes, state time required for examination-in-chief of these witnesses in <b>Annex A</b> . |
| Use of Language<br>Interpreter(s)                            | Yes / No*   |

|  | If yes, please state particulars in <b>Annex B</b> .                                |                |  |  |  |
|--|---|----------------|--|--|--|
|  |   |                |  |  |  |
| Time for Cross-Examination of other parties' witnesses   | Please provide details in <b>Annex C</b> .  |                |  |  |  |
|  | Total Duration:   |                |  |  |  |
|  |   | day(s)         |  |  |  |
| Time for Opening<br>Submissions  |   | day(s)         |  |  |  |
| Time for Closing Submissions   |   | day(s)         |  |  |  |
| Total number of trial days:counsel)  | Total number of trial days: (Estimated in consultation with other parties' counsel) |                |  |  |  |
| I understand that if any of my witnesses require the services of a court language interpreter, I will have to ensure that the interpreter is available by the first day of trial. Further, if an external language interpreter is required, I undertake to find a suitable person agreeable to all parties and ensure that he or she is available by the first day of trial. |   |                |  |  |  |
| I understand that this statement will be put before the Trial Judge and I will comply with the above timings stated. I will inform the registry immediately, and in any case, no later than 14 days from the first day of trial, if there are any changes to the information I have provided.  |   |                |  |  |  |
| Name of Lead Counsel for Part  | y Si  | gnature / Date |  |  |  |
|  |   |                |  |  |  |

<sup>\*</sup> Delete as appropriate

#### **PART TWO: LIST OF ISSUES**

[This List of Issues will be placed before the Trial Judge to assist the Trial Judge in the conduct of the trial. Counsel should be concise and identify the key issues, rather than setting out detailed sub-issues]

#### I. Agreed List of Issues

| S/N | Factual Issues |
|-----|----------------|
| 1   |                |
| 2   |                |
|     |                |
|     |                |
|     | Legal Issues   |
| 1   |                |
| 2   |                |
|     |                |
|     |                |

### **II.** Non-Agreed List of Issues

| S/N | Additional Issues according to Claimant |
|-----|---|
| 1   |   |
| 2   |   |
|     |   |
|     |   |
|     |   |

|   | Additional Issues according to Defendant |
|---|--|
| 1 |  |
| 2 |  |
|   |  |

## III. Common Ground between Parties ("Non-issues")

| C/NI | Main Facts Not in Dispute    |
|------|------------------------------|
| 5/11 | Main Pacis Noi in Dispute    |
| 1    |                              |
| 2    |                              |
|      |                              |
|      |                              |
|      | Points of Law Not in Dispute |
| 1    |                              |
| 2    |                              |
|      |                              |
|      |                              |

### Annex A

Time for Examination-in-Chief of Own Party's Witnesses

| Name | Capacity* | Time Required for Examination-in-Chief (day/s) |
|------|-----------|--|
|      |           |  |
|      |           |  |
|      |           |  |
|      |           |  |
|      |           |  |
|      |           |  |
|      | Name      | Name Capacity*                                 |

<sup>\*</sup> Indicate "Factual" or "Expert".

Annex B

Interpreters for Own Party's Witnesses

| S/N | Name | Capacity* | Language Required | Whether external interpreters required |
|-----|------|-----------|-------------------|--|
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |
|     |      |           |                   |  |

<sup>\*</sup> Indicate "Factual" or "Expert".

<u>Annex C</u>

Time for Cross-Examination of Other Parties' Witnesses

| S/N | Name | Party Type (e.g., for<br>Claimant, Defendant,<br>Third Party, etc.) | Capacity* | Time required for<br>Cross-Examination<br>(days) |
|-----|------|---|-----------|--|
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |
|     |      |   |           |  |

<sup>\*</sup> Indicate "Factual" or "Expert".