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Your Law Firm Name Goes Here
Any City, Any Town, Any State

GENERAL CHECKLIST

FILING COMPLAINT:

- ☐ Elements of each cause of action checked
- ☐ Statute of limitations checked
- ☐ Summons attached
- ☐ Local forms required

- ☐ Complaint filed
- ☐ Received file-stamped copy from court
- ☐ Complaint sent to client

SERVICE OF COMPLAINT:

- ☐ Complaint sent out for service
- ☐ Complaint served
- ☐ Proof of Service filed with court

ANSWER:

- ☐ Answer filed/received
- ☐ Answer served on plaintiff
- ☐ Received file-stamped copy of answer from court
- ☐ Answer sent to client

CROSS-COMPLAINT:

- ☐ Elements of each cause of action checked
- ☐ Statute of Limitations Checked
- ☐ Cross-complaint filed
- ☐ Received file-stamped copy from court
- ☐ Cross-complaint sent to client

ANSWER TO CROSS-COMPLAINT:

- ☐ Answer to cross-complaint filed/received
- ☐ Answer served on cross-complainant
- ☐ Received file-stamped copy of answer from court
- ☐ Answer sent to client

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DEFAULT

- Statutory time to answer expired
- Notice of default completed
- Notice of default filed with court
- Notice of default served on defendant
- Notice of default sent to client
- Check local rules for default prove-up requirements

- Default prove-up hearing scheduled
- Default prove-up hearing calendared
- Default prove-up hearing evidence gathered

DEFAULT JUDGMENT

- Default judgment prepared
- Default judgment signed by judge
- Default judgment filed with court
- Default Judgment recorded

DEMURRER:

- Demurrer researched for each cause of action
- Demurrer filed with court
- Demurrer hearing date set
- Demurrer hearing date calendared
- Demurrer served on plaintiff
- Order on demurrer prepared
- Order on demurrer filed
- Order on demurrer served on plaintiff

OPPOSITION TO DEMURRER:

- Each point of demurrer researched
- Opposition filed with court
- Opposition served on defendant
- Demurrer hearing date calendared

REPLY TO OPPOSITION TO DEMURRER:

- Reply filed with court
- Reply served on plaintiff

DISCOVERY:

- Discovery plan developed
- Interrogatories sent ____ Answered by Opposition

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Form Interrogatories sent ____ Answered by Opp.
Request for production of documents ____ Answered by Opp.
Request for examination of plaintiff ____ Answered by Opp.
Request to examine land or items ____ Answered by Opp.
Requests for Admissions ____ Answered by Opp.
Depositions set:
____ Plaintiff
____ Defendant
____ Other _____

Other discovery _____
Motions to compel deadline checked _____
____ Motion filed
____ Motion served

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RESPONSE TO OPPOSITION DISCOVERY

- ___ Interrogatories Answered and Verified
- ___ Form Interrogatories Answered and Verified
- ___ Request for Production of Documents Answered and Verified
- ___ Request for Admissions Answered and Verified
- ___ Deposition dates calendared:
 - ___ Plaintiff
 - ___ Defendant
 - ___ Other
- ___ Other discovery answered

TRIAL PREPARATION

- ___ Trial brief prepared
- ___ Written settlement offers sent
- ___ Status Conference Statements prepared
- ___ Stipulations signed
- ___ Trial notebook prepared
- ___ Motions in Limne prepared
- ___
- ___
- ___
- ___ Jury Instructions prepared
- ___ Witness List Prepared
- ___ Exhibit List prepared
- ___ Subpoenas prepared
 - ___ served
- ___ Subpoena duces tecum prepared
 - ___ served
- ___ Jury fees posted
- ___ Court reporter fees posted
- ___ Voir Dire questions prepared
- ___ Short statement of case prepared
- ___ Notice to produce witnesses and evidence at trial
 - ___ served on opposition
- ___ Witnesses prepared for trial
- ___ Copies of all documents or document books prepared