COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

{{ trial\_court.department }}

{{ trial\_court }}

{{ trial\_court.division }}

{{ trial\_court.address.county }}

DOCKET NO: {{ docket\_number }}

{{ other\_parties[0].name.full() }},

{{ plaintiff }} ,

v.

{{ users[0].name.full() }},

Defendant

DEFENDANT RESPONDENT’S

PRETRIAL MEMORANDUM

**THIS PRE-TRIAL MEMORANDUM**

This Pre-trial memorandum is submitted by {{ users[0].name.full() }}, {{defendant }} Defendant in the above-captioned matter, in accordance with the Pre-trial Notice and Order of the Court assigning this matter for Pre-trial Conference to be held on {{ trial\_date }}.

**PARTIES AND COUNSEL**

Names, address and telephone numbers of Parties and Counsel are as follows:

Name of Plaintiff:

Name of Defendant:

{{ users[0].name.full() }}

Address of Defendant:

{{ users[0].address.block() }}

{{ other\_parties[0].name.full() }}

Address of Plaintiff:

{{ plaintiff[0].address.block() }}

Name of Plaintiff’s Attorney:

{{ attorneys[0].name.full() }}

Address of Plaintiff’s Attorney:

{{ attorneys[0].address.block() }}

**GENERAL DESCRIPTION OF CLAIMS AND DEFENSES OF THE PARTIES**

1. {{ other\_parties }} filed a complaint for divorce on {{ complaint\_filed\_date }} in the {{ trial\_court }}

{{ users }} filed a {{ answer\_counterclaim }} on {{ answer\_counterclaim\_date }} in the {{ trial\_court }}

1. {{ grounds\_original\_divorce }}
2. {{ relief\_original\_divorce }}
3. {{ grounds\_counterclaim\_answer }}
4. {{ counterclaim\_answer\_requested\_relief }}
5. {{ Restraining\_Orders }}

**UNCONTESTED FACTS**

{{ uncontested\_facts }}

**CONTESTED ISSUES OF FACT**

{{ contested\_issues\_of\_fact }}

**CONTESTED ISSUES OF LAW**

{{ contested\_issues\_of\_law }}

**STATUS OF DISCOVERY**

{{ status\_of\_discovery }}

**SCHEDULE OF EXHIBITS**

{{ users\_exhibits }}

**LIST OF WITNESSES**

{{ users\_witnesses }}

**LIST OF EXPERT WITNESSES**

{{ users\_expert\_witnesses }}

**CURRENT FINANCIAL STATEMENT**

A current Financial Statement of {{ user[0].name.full() }} is submitted herewith pursuant to Rule 401 of the Supplemental Rules of the Probate Court.

**ESTIMATE OF TRIAL TIME**

The defendant anticipates that the trial of this matter will take {{ estimated\_length\_of\_trial }}

**WRITTEN OFFER OF PROOF REGARDING FACTORS PURSUANT TO G.L. c. 208 §§34, 48-55**

1. {{ length\_of\_marriage }}
2. {{ conduct\_of\_parties\_during\_marriage }}
3. {{ house\_value }}
4. {{ contribution }}
5. {{ users[0].age\_in\_years() }}
6. {{ other\_parties[0].age\_in\_years() }}
7. {{ users\_occupation }}
8. {{ other\_parties\_occupation }}

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

By Defendant

|  |
| --- |
| {{ users[0].signature\_if\_final(i) }} |
| {{ users[0].address.block() }} |
| {{ users[0].phone\_numbers() }} |
| {{ users[0].email\_address() }} |

Dated: {{ today() }}