

State of Illinois,
Circuit Court for the Seventh Judicial Circuit
_____County, Illinois

_____))
_____))
Wife))
v.))
_____))
_____))
Husband))

Final Pre-trial Memorandum- With Children

Parties (check applicable boxes)

Wife appears pro se with attorney _____.

Husband appears pro se with attorney _____.

Child Representative/GAL _____.

Wife's date of birth: _____ Husband's date of birth: _____.

Date of marriage: _____ Date of separation: _____.

Wife's address: _____.

Husband's address: _____.

Dependant children of this relationship:

_____ M/F d/o/b: _____ lives with _____

Parenting Class Compliance:

Wife has completed has not completed has been excused.

Husband has completed has not completed has been excused.

Child Custody and Child Support.

The parties have reached agreement as to the following issues:

Custody and visitation Support Maintenance

The parties have not been able to reach agreement with regard to child custody and visitation.

The parties have made a good faith effort to mediate, without success.

The court finds that there is an impediment to mediation.

The following temporary orders have previously been entered:

Custody: _____.

Visitation: _____

Child support: _____

Custody and visitation partial agreements: _____

Custody and visitation stipulations: _____

Wife's statement of custody and visitation issues before the court (use additional sheets if necessary)

Husband's statement of custody and visitation issues before the court (use additional sheets if necessary)

- A motion has been filed asking the court to interview minor child or children.
- The parties have agreed to waive presence of counsel at *in camera* interview.

Each party is to attach to this final pre-trial memorandum the following information:

1. Statement of issues presented to the court;
2. Stipulations and partial agreements;
3. Potential witnesses, with current address, together with statement of whether witness will render an opinion and whether there has been compliance with Supreme Court Rule 213;
4. Financial affidavit of Income, Expenses, Assets, Debts, executed no more than 14 days prior to trial;
5. Marked potential exhibits, with exhibit number and date of hearing;
6. List of assets, including the proposed value to be assigned to each asset;
7. List of household goods and personal property requested if in the possession of the other party;
8. List of debts, both as to current balance; monthly payment, and whether it is secured by property;
9. List of property claimed to be non-marital, with explanation;
10. List of debts claimed to be non-marital, with explanation;
11. Proposed resolution regarding custody and visitation;
12. Proposed calculations of net income, child support and/or maintenance;
13. Proposed distribution of property and debts, including contested personal property.

14. Petition for attorney's fees, with affidavit through day of trial;
15. Proposed allocation of Child Representative/GAL fees;
16. Proposed resolution of other issues.

Counsel/parties certify that they have personally met, exchanged information necessary for the preparation of this Final Pre-trial Memorandum, and discussed the issues required to be presented to the court at trial.

Date: _____

Attorney for Wife

Attorney for Husband