

.....**STATE OF ILLINOIS**  
**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL COURT**  
**COUNTY OF WINNEBAGO**

IN RE THE MARRIAGE OF	)	
	)	IN CHANCERY
	)	
_____	)	CASE NO. _____
Plaintiff	)	
vs.	)	
	)	
_____	)	
Defendant	)	

PRE-TRIAL MEMORANDUM OF  PLAINTIFF  DEFENDANT

**PLAINTIFF COUNSEL:**

**DEFENDANT COUNSEL:**

**G.A.L.:**

**I. THE PARTIES**

- A. Plaintiff:
  - Address
  - Age
  - Place of Employment
- B. Defendant:
  - Address
  - Age
  - Place of Employment
- C. Children (List for each child):
  - Name, Age, School, Party residing with

**II. BRIEF STATEMENT OF MATTERS PENDING BEFORE THE COURT:**

Plaintiff pleadings:

Defendant's pleadings:

**APPENDIX P - Continued**

**III. ISSUES OF LAW AND FACT**

- A. The parties have reached a stipulation regarding custody of the children     Yes    No    N/A
- B. The parties have reached a stipulation regarding visitation of the children.    Yes    No    N/A
- C. Statement of Other Agreed Issues (*e.g., child support, maintenance, property division, etc.*);

D. Statement of Disputed Issues (*e.g., custody, visitation, child support, maintenance, property division, etc.*):

E. Proposed Resolution of All Issues (*Identify if agreed or N/A*)

Custody

Visitation

Child Support

Health insurance / uncovered health expenses

Dependency exemptions

Other issues

Support for Non-Minor Children

Maintenance

Property Distribution

Real estate

Cash or cash equivalents

**APPENDIX P - Continued**

Property Distribution - Continued

Investment accounts and securities

Motor vehicles

Business interests

Insurance policies

Retirement assets

Employee benefits

Pending claims

Debt

Miscellaneous personal property (*attach separate exhibit with list of proposed division of disputed personal property, with statement of value*)

Attorneys Fees

Guardian at litem Fees / Opinion Witness Fees

Resumption of Former Name

Other Issues

IV. **WITNESSES** (*Specifically identify opinion witnesses and subject matter of opinion testimony*)

V. **EXHIBITS** (A Comprehensive Financial Statement, Part I - Financial Affidavit, must be attached in all cases involving contested issues of maintenance, child support or support for non-minor children. A Comprehensive Financial Statement, Part II - Statement of Assets and Liabilities, must be attached in all cases involving contested issues of property distribution).

Dated: \_\_\_\_\_

Respectfully submitted by:

\_\_\_\_\_  
Attorney for  Plaintiff  Defendant