

PRELIMINARY HEARING CHECKLIST FOR ARBITRATIONS

1. **Purpose.** Explain the purpose and goals of the hearing.
2. **Claims & Issues.** Have each party make a brief statement outlining the issues in dispute and associated claims. Discuss attorney fee claims.
3. **Related Identities.** Identify any related entities for purposes of arbitrator conflicts check.
4. **Pleadings.** Review pleadings filed and to be filed.
5. **Motions.** Review any expected motions.
6. **Exchange of Information.** Review procedure and set guidelines (if necessary).
Review Accelerated Exchange procedure.
7. **Discovery.** Confidentiality order necessary? Review extent of discovery (# of depositions, etc), use of expert witnesses
8. **Pre-Hearing Deadlines.** Set deadlines for:
 - a. Initial exchanges of witness lists, exhibit lists and exhibits, deposition testimony designations/counter designations.
 - b. Joint Statement of Evidence.
 - c. Stipulation of Agreed Legal Issues.
 - d. Final witness and exhibit lists.
 - e. Motions.
 - f. Discovery cut-off.
 - g. Additional preliminary hearings.
9. **Hearing.** Set date/time/location.
 - a. Determine need for court reporter or interpreter.
 - b. Deadline for hearing briefs.
 - c. Start & stop times, notice of next day witnesses, allocation of time, exhibit submission, including number of exhibit sets and color coding.
 - d. Form of Award.