

**IN THE COMMON PLEAS COURT OF ERIE COUNTY, OHIO
DOMESTIC RELATIONS DIVISION**

Plaintiff

CASE No. _____

-vs-

D.R. Form 7.00

Defendant

PRETRIAL STATEMENT AND SETTLEMENT PROPOSAL

INSTRUCTIONS: Each party is required to file a Pretrial Statement/Settlement Proposal no later than the day of the Pretrial. That pleading should contain the following information at a minimum, as applicable to the case.

Now comes _____ and makes the following Pretrial Statement and Settlement Proposal pursuant to Local Rule 18(E):

STATUS OF DISCOVERY:

TYPE OF DISCOVERY:	Not applicable	Completed	Needs to be done
Appraisals of any real estate			
Appraisals of personal property			
Copies of the last three (3) years of federal income tax returns			
Balances due on all liabilities of either or both of the parties			
Income information, including overtime for the past three (3) years			
Copies of the most recent statement on all bank accounts, IRA's, CD's, stocks, mortgages or other assets for which the parties receive a statement			
Pension and profit-sharing plan information and valuation			
Health insurance information, including the cost of COBRA coverage			
Copies of deeds, vehicle registrations or titles			
Other:			
Other:			
Other:			

OTHER DISCOVERY INFORMATION:

DISPUTED FACTUAL OR LEGAL ISSUES:

WITNESS LIST FOR FINAL HEARING:

ESTIMATED LENGTH OF FINAL HEARING:

PROPOSAL FOR SETTLEMENT:

JURISDICTION AND VENUE: ___ This Court has jurisdiction and venue to grant a final decree of divorce to the parties.
___ Jurisdiction and Venue is disputed.

GROUND: A divorce shall be granted in this case as follows:

___ To Plaintiff on grounds of : _____
___ To Defendant on grounds of: _____

ALLOCATION OF PARENTAL RIGHTS AND RESPONSIBILITIES:

___ Sole Allocation of Parental Rights and Responsibilities: ___ To Mother ___ To Father

OR

___ Split Allocation of Parental Rights and Responsibilities:

___ Mother shall be Residential Parent and Legal Custodian of: _____

___ Father shall be Residential Parent and Legal Custodian of: _____

___ Shared Parenting **pursuant to the attached Proposed Shared Parenting Plan**

PARENTING TIME: Effective _____, ___ Mother ___ Father shall have parenting time with the minor child(ren) as follows:

___ Pursuant to Local Rule 24 without modification

___ Pursuant to Local Rule 24 with the modifications contained on the attached Exhibit _____.

___ As set forth on Exhibit _____.

CHILD SUPPORT: Effective _____, ___ Mother ___ Father shall pay child support in the sum of \$_____ per month, per child, for a total of \$_____, plus processing fee.

___ Said amount is calculated according to the Guidelines Worksheet attached as Exhibit _____.

___ Said amount represents a deviation from Guidelines which is appropriate for the following reason(s):

HEALTH EXPENSES: The health expenses of the minor child(ren) shall be paid as follows: _____ . Any uninsured health expenses of the minor child(ren) shall be divided between the parties in the following percentages: Father _____% Mother _____%

HEALTH INSURANCE: ___ Father and/or ___ Mother shall carry health insurance on the minor child(ren), so long as it is available at a reasonable cost through his or her employment. ___ Neither party has health insurance available to them at the present time for a reasonable cost, but each party shall obtain insurance for the children in the future if it becomes available to him or her at a reasonable cost. A Dependent Health Care Order shall be issued in this case.

TAX EXEMPTIONS and CREDITS FOR MINOR CHILD(REN): The tax dependency exemptions and credits for the minor child(ren) shall be allocated as follows: _____.

If awarded, the nonresidential parent shall ONLY be entitled to take any tax exemption for a child allocated to him or her, so long as he or she is current in the payment of his or her child support obligation on or before January 31st. of the year following the year for which the exemption will be claimed.

TEMPORARY SUPPORT ARREARAGES:

___ There is no temporary support arrearage issue in this case. **OR**

___ The Obligor owes temporary support arrearages and those arrearages shall survive the final decree of divorce and be paid as follows:

SPOUSAL SUPPORT:

___ No spousal support shall be paid by either party to this case. **OR**
___ Effective _____, the _____ shall pay the spousal support to the _____ in the sum of \$ _____ per month, plus processing fee. Said spousal support order shall terminate upon the death of either party, the obligee's remarriage or cohabitation with an unrelated adult person of the opposite gender or _____. The Court ___ shall ___ shall not reserve jurisdiction over the ___ term and/or ___ amount of this spousal support order.

COBRA HEALTH INSURANCE COVERAGE:

___ Neither party will be obtaining COBRA health insurance through the other party's employment. **OR**
___ The _____ shall pay for COBRA health insurance coverage on the _____ for a period of _____ from the date of the final decree of divorce. **OR**
___ The _____ may maintain COBRA health insurance coverage through the _____ current employment, at his or her won cost.

SEPARATE PROPERTY: Each party shall be awarded his or her separate property and shall pay his or her separate debt as follows: ___ See Exhibit _____ **OR**

To Wife:

To Husband:

ATTORNEY FEES:

___ Each party shall pay his or her own attorney fees for this case. **OR**
___ The _____ shall pay the sum of \$ _____ towards the _____'s attorney fees. Said sum shall be paid as follows:

MAIDEN NAME: The Wife's maiden name ___ shall ___ shall not be restored. Her maiden name is _____.

MARITAL PROPERTY DIVISION: The parties' marital assets and debts should be divided as follows: See Exhibit _____ **OR**

AWARD TO or PAID BY:

<u>Asset or Debt</u>		<u>Value or Balance</u>		<u>To Wife</u>		<u>To Husband</u>
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
_____	\$	_____	\$	_____	\$	_____
TOTALS	\$	_____	\$	_____	\$	_____

RESTRAINING ORDERS:

No permanent restraining orders shall issue in this case. **OR**
 Mutual permanent restraining orders shall issue in the final decree of divorce prohibiting either party from harassing, molesting or interfering with the other party.

OTHER ISSUES:

See Exhibit _____ **OR**
 There are no other agreements between the parties.

COURT COSTS:

By Plaintiff By Defendant Split between the parties equally.

 Plaintiff/Defendant

 Counsel for Plaintiff/Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Pretrial Statement and Settlement Proposal was served upon the opposing party or counsel for the opposing party this _____ day of _____, 20____.

 Counsel or Party