

## Editor's Introduction to the 2024-2025 Edition

Lane's Goldstein Litigation Forms is designed to provide the trial lawyer with a compact, practice-oriented set of books to assist with the drafting of effective litigation-related forms, correspondence and documents. The portable soft-bound format of the book is tailor-made to accommodate the active litigator.

The three-volume set includes a wide range of forms useful at every stage of litigation from pre-filing intake through pleadings, discovery, motions and trial, and continuing through judgments, post-trial motions and appeals, as well as related topics such as arbitration, settlements, and releases. Every effort is made to maximize the utility of the forms, which may be modified to fit the facts and circumstances of a particular case, or to conform to evolving federal and state rules of practice and procedure.

New to the 2024 edition are forms covering a wide range of issues and applications across all three volumes, including the following:

- One driver v. one driver—Defendant driver employee of vehicle owner
- One driver vs. two drivers—Interstate highway collision
- One passenger v. one driver (not of passenger's car)—Negligently entering lane while travelling in same direction
- Insurer vs. one driver—Property damage
- Notice of appearance
- Notice of adoption of answer and affirmative defenses
- Notice of hearing
- Pretrial conference and motion hearing notice
- Pretrial conference statement—Joint—Action arising from motor vehicle accident
- Pretrial conference statement—Defendant—Action arising from motor vehicle accident

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- Joint pretrial stipulation—Action arising from motor vehicle accident
- Defendant's motion—Automobile accident—Expiration of statute of limitations
- Defendant's motion—Brief in opposition to motion based on expiration of limitation period
- Plaintiff's motion—Collections—Breach of agreement to pay legal fees
- General form—Precluding evidence in libel and slander action
- General form—Precluding evidence of damages
- Motion to strike trial brief—New and irrelevant matter prohibited by pre-trial case management order
- Response to motion to strike trial brief—Purpose of trial brief is to inform court
- Disclosure of medical expert witness
- Proposed jury instructions—Civil case—Consideration of evidence
- Proposed jury instructions—Civil case—Consideration of expert witness testimony
- Proposed jury instructions—Civil case—Burden of proof—Damages
- Amendment of complaint—Identifying fictitious defendant
- Petition to intervene—Workers compensation matter
- Petition to intervene—Financial interest of attorney
- Complaint in intervention—By underinsurance carrier
- Request for production—Specified documents—Prior cases in which experts have testified
- Requests for admission—Admissions of fact—Automobile accident case
- General Form—Payment of traffic citation in connection with collision
- General Form—Reference to defendant's vehicle involved in collision as taxicab
- Request to take judicial notice—Order allowing class certification
- Request to take judicial notice—Court files
- Request to take judicial notice—Matters in declaration
- Request to take judicial notice—Orders of other courts
- Order sustaining demurrer

- Opposition to motion for new trial on damages
- Motion for judgment notwithstanding verdict—Improper consideration of Respondeat Superior by jury
- Opposition to motion notwithstanding verdict
- Petition to confirm award
- Petition to confirm stipulated award
- Petition for order authorizing settlement
- Petition for approval to transfer structured settlement proceeds
- Petition for sanctions—Failure to issue check in exchange for release

Whether you are a new or ongoing user of this set we hope you will find Lane's Goldstein Litigation Forms to be a valuable resource in your practice.