

**JUDGE FREUDENTHAL'S GUIDELINES FOR PROPOSED FINDINGS OF
FACT AND CONCLUSIONS OF LAW FOR BENCH TRIALS**

- (a) Each side shall serve and file proposed findings and conclusions that shall include:
 - (1) A narrative statement of all facts proposed for the Court's order resolving the trial; and
 - (2) A concise statement of all legal conclusions proposed for the Court's order, with authorities in support.

- (b) Each side's statement of facts shall:
 - (1) Be stated in simple declarative sentences;
 - (2) Be based on the evidence expected to be presented at trial;
 - (3) Be complete in itself and shall contain no recitation of any witness' testimony or what any party stated or admitted in these or other proceedings, and no references to the pleadings or other filings. The statement of facts may contain references in parentheses to the names of witnesses, depositions, pleadings, exhibits or other documents on which a particular sentence is based;
 - (4) So far as possible, contain no pejoratives, labels or legal conclusions.

- (c) Each side's statement of legal conclusions shall:
 - (1) Set forth all legal contentions necessary to support the claims and defenses expected to be pursued at trial;
 - (2) Shall be clearly and concisely stated in separately numbered paragraphs.
 - (3) Each paragraph shall be followed by citations of authorities in support thereof.