STATE OF ILLINOIS

HUMAN RIGHTS COMMISSION

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| --- | --- |
| IN THE MATTER OF:  Enter Complainant’s name(s),  Complainant,  v.  Enter Respondent’s name(s),  Respondent. | Charge No.: Enter Charge Number(s)  EEOC / HUD No.: Enter EEOC/HUD Number  ALS Case No.: Enter ALS Number  Administrative Law Judge  Enter Name of Administrative Law Judge |

**JOINT PREHEARING MEMORANDUM**

Pursuant to the procedural rules of the Illinois Human Rights Commission, the purpose of this joint prehearing memorandum is to ascertain the positions of the parties and to reach agreements on stipulations of fact, admissibility of documents, and other matters that may expedite the conduct of a public hearing in an Administrative Law Section case. *See* 56 Ill. Adm. Code § 5300.710(a). While all parties must sign any joint prehearing memorandum that is filed with this administrative court, any party may volunteer to draft the initial version of the pleading before providing a copy to all opposing parties for additions, revisions, and/or modifications.

Where one or both parties fail to substantially comply with the directions for preparing a joint prehearing memorandum, the assigned administrative law judge may apply any appropriate sanction, including a recommendation of dismissal or default. *See* 56 Ill. Admin. Code § 5300.710(b). Use additional pages as necessary to provide the information required by 56 Ill. Adm. Code § 5300.710 and § 14 of the Standing Order for All Cases Filed Before the Administrative Law Section.

**I. CONTACT INFORMATION:**

|  |  |  |  |
| --- | --- | --- | --- |
| Information for each party filing this prehearing memorandum. | | | |
| NAME | REPRESENTING | TELEPHONE # | EMAIL ADDRESS |
| Name | Representing | Telephone # | Email Address |
| Name | Representing | Telephone # | Email Address |
| Name | Representing | Telephone # | Email Address |
| Name | Representing | Telephone # | Email Address |

**II. CAUSES OF ACTION AND AFFIRMATIVE DEFENSES:**

|  |
| --- |
| The causes of action asserted by Complainant in the currently-controlling version of the complaint are as follows: |
| Click or tap here to enter text. |

|  |
| --- |
| The affirmative defenses asserted by Respondent in the currently-controlling version of the answer are as follows: |
| Click or tap here to enter text. |

**III. STIPULATIONS OF FACT:**

|  |
| --- |
| Provide a numbered list of any stipulated facts in this matter relating to liability or damages (this list will be read and received into evidence at the public hearing): |
| Click or tap here to enter text. |

**IV. DAMAGES** (For Complainants):

|  |  |  |
| --- | --- | --- |
| Complainant is seeking the following damages at trial: | | |
| **Nature or Type of Damages** | | **Amount Sought** |
| Emotional Distress: | | Click or tap here to enter text. |
| Out-of-Pocket Losses Total:  List the *total* amount on this line, then list each specific loss or cost which makes up this total and the amount of each loss or cost below  (*e.g.*, “Lost Wages – $X.XX)  Unless ordered to do so by the assigned administrative law judge, you are not required to list your attorneys’ fees or litigation costs | | Click or tap here to enter text. |
|  | Click or tap here to enter text. | Click or tap here to enter text. |
|  | Click or tap here to enter text. | Click or tap here to enter text. |
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|  | Click or tap here to enter text. | Click or tap here to enter text. |

I am enclosing additional information about requested damages.

**V. WITNESSES:**

|  |  |  |
| --- | --- | --- |
| Complainant plans to call the following witnesses to testify at the public hearing: | | |
| NAME | REVEALED DURING DISCOVERY | TOPIC OF TESTIMONY |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |

I do not plan to call any witnesses other than myself.

I am enclosing additional information about my witnesses.

I am enclosing information about one or more expert witnesses.

|  |  |  |
| --- | --- | --- |
| Respondent plans to call the following witnesses to testify at the public hearing: | | |
| NAME | REVEALED DURING DISCOVERY | TOPIC OF TESTIMONY |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |

I do not plan to call any witnesses other than myself.

I am enclosing additional information about my witnesses.

I am enclosing information about one or more expert witnesses.

**VI. DOCUMENTS AND PHYSICAL EVIDENCE:**

Documents not presented in the prehearing memorandum will not be permitted at the public hearing. Failure to object operates as a waiver. There is no right to “reserve” objections.

|  |  |  |
| --- | --- | --- |
| Complainant plans to present the following evidence at the public hearing: | | |
| NAME AND NUMBER OF EXHIBIT | REVEALED DURING DISCOVERY | OBJECTED TO? |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |

|  |  |  |
| --- | --- | --- |
| Respondent plans to present the following evidence at the public hearing: | | |
| NAME AND NUMBER OF EXHIBIT | REVEALED DURING DISCOVERY | OBJECTED TO? |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |
| Click or tap here to enter text. | Select Yes or No. | Click or tap here to enter text. |

**VII. ANTICIPATED LENGTH OF PUBLIC HEARING**

Provide a brief statement on the expected length of the public hearing:

Click or tap here to enter text..

**VIII. STATUS OF SETTLEMENT NEGOTIATIONS**

Provide a brief statement summarizing the status of settlement negotiations (but REFRAIN from discussing the numerical value of any settlement offers that have been exchanged between the parties):

Click or tap here to enter text..

**For Complainant**:

|  |
| --- |
| **Printed Name:** Click or tap here to enter text.  **Law Firm (If Applicable):** Click or tap here to enter text.  **E-Mail Address:** Click or tap here to enter text.  s/ Click or tap here to enter text. |

**For Respondent**:

|  |
| --- |
| **Printed Name:** Click or tap here to enter text.  **Law Firm (If Applicable):** Click or tap here to enter text.  **E-Mail Address:** Click or tap here to enter text.  s/ Click or tap here to enter text. |