

GUIDE TO PREPARING TRIAL DOCUMENTS



This guide contains a summary of the key requirements for documents which you will need to prepare for your civil trial. It was prepared based on the contents of the [Rules of Court 2021](#) and [State Courts Practice Directions 2021](#) ("Practice Directions"). It also provides an overview of the directions typically issued by the Court for the filing of these documents.

It is important to follow the requirements and directions to facilitate efficient proceedings and case management as well as a proper presentation of your case.

The guide is meant for general informational purposes only and subject to any specific directions made by the Court. It is not intended as substitution for legal advice. A lawyer should be consulted should you require legal advice on your case. The State Courts disclaim any and all liabilities arising from and in connection with the contents of this guide.

If you have further queries on any part of this guide, please call us at 6587 8423 (6-JUSTICE) or 1800 587 8423 (1800-JUSTICE).

All information is correct as of **20 March 2025**.

CONTENTS

CHAPTER	1	Overview	5
	(A)	Key Documents to Prepare for a Civil Trial	6
	(B)	How to File the Documents and the Applicable Filing Fees	6
	(C)	Common Terms Used in This Guide	6
	(D)	Roadmap of the General Sequence to File Trial Documents	7
CHAPTER	2	General Requirements	8
CHAPTER	3	Affidavit of Evidence-in-Chief (AEIC)	10
	(A)	What You Need to Include in the AEIC	11
	(i)	Basic Requirements	11
	(ii)	Documentary Exhibits (Where Applicable)	11
	(iii)	Non-documentary Exhibits (Where Applicable)	12
	(B)	How to Prepare the AEIC	12
	(C)	Timeline	13
	(D)	How to Prepare the Hardcopy of the AEIC	13
CHAPTER	4	Notice to Admit Hearsay Evidence	14
	(A)	What You Need to Include in the Notice to Admit Hearsay Evidence	15
	(B)	How to Prepare the Notice to Admit Hearsay Evidence	15
	(C)	Timeline	15
CHAPTER	5	Notice for Setting Down an Action for Trial	16
	(A)	What You Need to Include in the Notice for Setting Down an Action for Trial	17
	(B)	How to Prepare the Notice for Setting Down an Action for Trial	17
	(C)	Timeline	17
CHAPTER	6	Notice of Objections to Contents of AEIC (Optional)	18
	(A)	What You Need to Include in the Notice of Objections to Contents of AEIC	19
	(B)	How to Prepare the Notice of Objections to Contents of AEIC	19
	(C)	Timeline	19

CHAPTER	7	Bundle of Documents	20
	(A)	What You Need to Include in the Bundle of Documents	21
		(i) General Requirements	21
		(ii) Agreed Bundle	21
		(iii) Party's Respective Bundle	21
		(iv) Core Bundle	21
	(B)	How to Prepare Bundle of Documents	22
	(C)	Timeline	22
	(D)	Hardcopy	22
CHAPTER	8	Opening Statement	23
	(A)	What You Need to Include in the Opening Statement	24
	(B)	How to Prepare the Opening Statement	24
	(C)	Timeline	24
	(D)	Hardcopy	24
CHAPTER	9	Bundle of Authorities	25
	(A)	What You Need to Include in the Bundle of Authorities	26
	(B)	How to Prepare the Bundle of Authorities	26
	(C)	Timeline	27
	(D)	Hardcopy	27
CHAPTER	10	Closing Submissions	28
	(A)	What You Need to Include in the Closing Submissions	29
	(B)	How to Prepare the Closing Submissions	29
	(C)	Timeline	29

CHAPTER 1

OVERVIEW

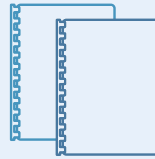


(A) Key Documents to Prepare for a Civil Trial

These are the key documents that you should prepare for a civil trial:



Affidavit of Evidence-in-Chief



Bundle of Documents



Notice to Admit Hearsay Evidence



Opening Statement



Notice for Setting Down an Action for Trial



Bundle of Authorities



Notice of Objections to contents of Affidavit of Evidence-in-Chief



Closing Submissions

(B) How to File the Documents and the Applicable Filing Fees

Please refer to the guides [here](#) for more information.

(C) Common Terms Used in This Guide

Claimant

The party who initiates the lawsuit, also known as the “Plaintiff”.

Defendant

The party against whom the lawsuit is brought.

Deponent

A person who gives written testimony under oath, usually in the form of an affidavit.

Affidavit

A written statement of facts sworn to be true by the deponent and signed before an authorised official such as a notary public or commissioner for oaths.

(D) Roadmap of the General Sequence to File Trial Documents**1****Start of Claim**

Parties file pleadings

**2****Case Conferences**

Court gives timelines for filing documents and moving the matter to trial

Timelines to file documents—to be directed by the Court:

- Affidavit of Evidence-in-Chief (AEIC)
- Notice to Admit Hearsay Evidence (to be filed at the same time as the AEIC)
- Notice for Setting Down an Action for Trial
- Notice of Objections to contents of AEIC (to be filed >28 days before trial)

**3****Pre-Trial Case Conference**

Court gives trial date

Timelines to file documents—to be directed by the Court around 1–2 weeks before trial:

- Bundle of Documents
- Opening Statement
- Bundle of Authorities

**4****Start of Trial**

Court hears evidence

No filing of documents without the Court's approval**5****End of Trial**

Court hears submissions

Timelines to file documents—to be directed by the Court:

- Closing Submissions
- Supplemental Bundle of Authorities

CHAPTER 2

GENERAL REQUIREMENTS



Please Read This First

The following general pointers apply to all documents and bundles mentioned in this Guide, unless stated otherwise.

Responsibility for Preparation

All parties are responsible for preparing the respective documents and bundles as described.

Filing on eLitigation

All the documents mentioned in this guide must be filed in the eLitigation system, except for:

- > Bundle of Affidavit of Evidence-in-Chief, which is a hardcopy bundle containing all the affidavits of evidence-in-chief which the Court usually directs the Claimant to prepare and submit to the Court before trial; and
- > the Bundles of Authorities which are generally optional.

Table of Contents

A table of contents is required if the bundle is 20 pages or more.

Hardcopy

- > If it is not possible to file the documents in advance, parties may seek the Court's permission to use paper documents during the hearing and provide an undertaking to file the documents on eLitigation by the next working day after the hearing.
- > In addition to the softcopies filed on eLitigation, the Court would usually direct the Claimant to prepare and submit hardcopies of the bundles filed (generally, the Bundle of Affidavits of Evidence-in-Chief, the Claimant's Bundle of Authorities, and the Bundle of Documents) around 1-2 weeks before the trial via correspondence.
- > The Claimant is generally expected to prepare 3 sets of all documents: one set of the respective bundles in hardcopy for:
 - (i) each party (unless parties agree to another arrangement);
 - (ii) the judge; and
 - (iii) the witness stand.
- > Your hardcopies must match the PDF version filed on eLitigation in all respects. Page numbers in the hardcopy version must correspond to the page numbers in the PDF version.

CHAPTER 3

AFFIDAVIT OF EVIDENCE-IN- CHIEF (AEIC)



What is the purpose of this document?

It is a witness statement used to provide evidence for use at trial. It may not be used if the person who made the statement does not attend court for cross-examination. However, if both parties agree, then it may be used even if the person who made the statement does not attend court for cross-examination.

(A) What You Need to Include in the AEIC

1. Basic Requirements

Material Facts

The AEIC, or “affidavit” in short, must include all the important facts relevant to the case. These facts may not be changed or added to during oral testimony unless new facts have emerged after the affidavit was written.

Admissible Evidence

Only evidence permitted by law should be included in the affidavit. As a general rule, for evidence to be admissible it must tend to prove or disprove some fact at issue in the proceeding. Please refer to the [Evidence Act 1893](#) for more details.

Swearing/Affirming Requirements

The affidavit must follow the swearing or affirming requirements outlined in [Practice Direction 63](#).

2. Documentary Exhibits (Where Applicable)

Documentary exhibits refer to documents you wish to present as evidence to support your case.

Table of Contents

If there are more than 10 documentary exhibits, include a table of contents before the first exhibit. Number each exhibit as per [Practice Direction 62\(2\)](#) and list the exhibits in the order that they are referenced in the affidavit.

Dividing Sheet

Each exhibit should have a clear dividing sheet at the beginning, marked in the format set out in [Practice Direction 62\(4\)](#).

Bookmarking in PDF

Each exhibit must be separately bookmarked in the PDF document filed on eLitigation.

- > The label of the bookmarks should follow the initials of the deponent, *e.g.*, “TAK-1”, “TAK-2”.
- > The numbering of the exhibits should run consecutively throughout all subsequent affidavits.

Reference to Exhibits

If a deponent wants to refer to documents already exhibited in another deponent’s affidavit, he must exhibit them to his/her own affidavit.

Related Exhibits

Related documents may be grouped together as one exhibit, arranged in chronological order.

Reference to Page Numbers

Where an affidavit refers to a documentary exhibit, the page number(s) of the affidavit where the relevant portions of the documentary exhibit can be found should be stated alongside the exhibit number.

(A) What You Need to Include in the AEIC (Cont'd)

3. Non-documentary Exhibits (Where Applicable)

Non-Documentary exhibits refer to physical artifacts or photo/video recordings you wish to present as evidence to support your case.

Marking

Non-documentary exhibits should be clearly marked. The affidavit should indicate that the exhibit is a non-documentary exhibit and refer to it using the relevant exhibit number.

Multiple Items

If the exhibit consists of more than one item, each separate item should be similarly marked to ensure precise identification.

(B) How to Prepare the AEIC

Standard Form

Prepare the affidavit based on [Form 31 of Appendix A2](#) to the Practice Directions.

Word Document Template

You can download a Word document template [here](#).

Annotated Samples

You can view annotated samples of the AEIC and Bundle of AEIC [here](#).

Top Right-hand Corner

Type or print in a single line at the top right-hand corner of the first page of every affidavit:

- > the party on whose behalf the affidavit is filed;
- > the name of the deponent;
- > the ordinal number (for instance, 1st, 2nd, 3rd and so forth) of the affidavit in relation to the affidavits filed in the cause or matter by the deponent; and
- > the filing date of the affidavit.

General Formatting Requirements

- > Provide a blank margin of not less than 35 mm wide on all four sides of the page.
- > Text of the affidavit must be printed or typed and double-spaced on white paper.
- > Number every page of the affidavit (including separators and exhibits). Place the page number at the top right-hand corner of the page.

(C) Timeline

The timeline for filing the affidavit will be directed by the court and typically occurs after (at least) the pleadings have been filed.

Separately, the Court would usually direct the Claimant to prepare and submit a Bundle of Affidavits of Evidence-in-Chief ("Bundle of AEICs") to the Court usually around 1-2 weeks before the trial via correspondence sent to your email or mailing address on record. A "Bundle of AEICs" is different from an AEIC — it is essentially a compilation of the AEICs that all parties would be relying on at trial. The said correspondence would usually inform parties to submit a hardcopy of the bundle by a certain date. It would also usually state that if the AEIC have been individually filed on eLitigation, there is no need to re-file the "Bundle of AEICs" on eLitigation.

(D) How to Prepare the Hardcopy of the AEIC

Paper Quality

Print on A4 paper of good quality.

Printing

May be printed on one side or both sides of the paper.

Bundling or Stapling

- > Affidavits of 30 pages or less (including the exhibits, dividers, and backing sheets) may be stapled at the top left-hand corner of the paper firmly.
- > Affidavits exceeding 30 pages (including the exhibits, dividers, and backing sheets) shall be bound in red rings or spines for the claimant and blue for the defendant, with a transparent plastic cover in front and at the back. We request different colours for the claimant and defendant in order to have clarity on which copy is meant for which party. You may approach any photocopy or printing shop for services to print, bind the AEIC and to include transparent plastic covers.

Sample:



CHAPTER 4

NOTICE TO ADMIT HEARSAY EVIDENCE



What is the purpose of this document?

To notify other parties of your intention to rely on hearsay evidence contained in the affidavit of evidence-in-chief. This notice is only required if a party intends to present hearsay evidence at trial.

(A) What You Need to Include in the Notice to Admit Hearsay Evidence

Grounds for Relying on Hearsay

State the grounds in [section 32 of the Evidence Act 1893](#) that the party relies on. Hearsay evidence generally refers to information that the witness hears from someone else rather than his/her personal knowledge.

Documentary Hearsay

If the statements to be admitted are contained in a document, state:

- > the time and place at which the statements were made;
- > the name of the person who made the document (the maker) and his/her address, if known;
- > if the maker had passed away, the date of death, if known; and
- > a copy of the document or the relevant part thereof.

Non-documentary Hearsay

If the statements to be admitted are not contained in a document, state:

- > the time and place at which the statements were made;
- > the name of the maker and his/her address, if known;
- > if the maker had passed away, the date of death, if known;
- > whether the statements were made orally or otherwise;
- > the name and address of the person who heard or perceived the statement being made; and
- > the substance of the statements or, if the statements were made orally and the exact words used are material, the actual words used.

(B) How to Prepare the Notice to Admit Hearsay Evidence

Documentary Hearsay

Use [Form 18A of Appendix A1](#) to the Practice Directions (if the statements to be admitted are contained in a document).

Non-documentary Hearsay

Use [Form 18B of Appendix A1](#) to the Practice Directions (if the statements to be admitted are not contained in a document).

Word Document Template

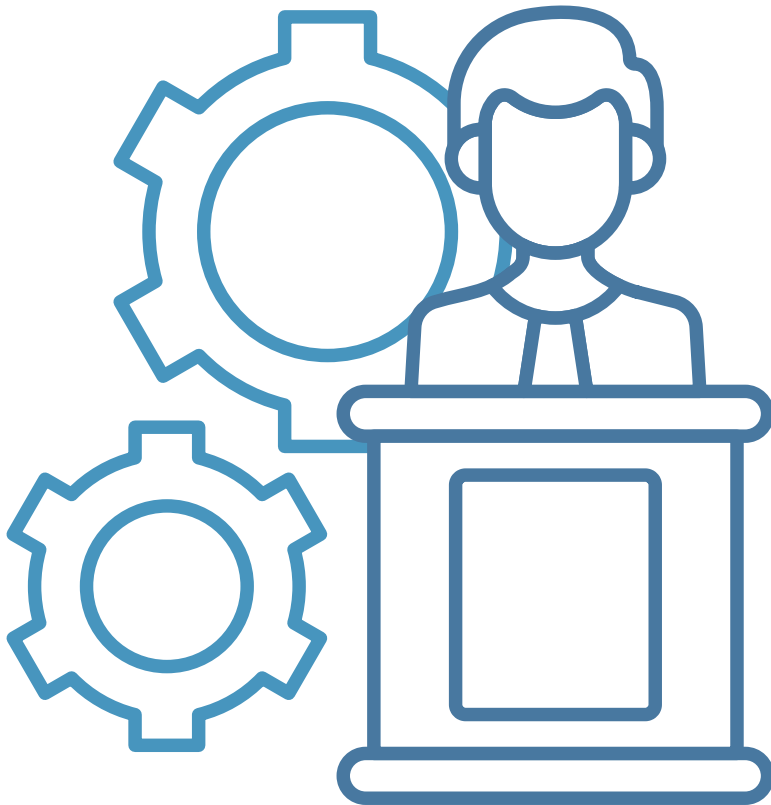
You can download a Word document template of Form 18A [here](#).

(C) Timeline

Serve the notice by correspondence to all other parties when you serve the affidavit(s) of evidence-in-chief.

CHAPTER 5

NOTICE FOR SETTING DOWN AN ACTION FOR TRIAL



What is the purpose of this document?

To set down the action for trial, which is an indication to the Court that parties are ready for trial.

(A) What You Need to Include in the Notice for Setting Down an Action for Trial

State the (a) length of the trial (in number of days); (b) trial dates (that is the dates that parties are available on); and (c) witnesses (if any) for each party.

Please seek the other parties' inputs on the information to be stated in this document unless the Court has issued directions on the same.

(B) How to Prepare the Notice for Setting Down an Action for Trial

Standard Form

Fill up the eForm on eLitigation by reference to [Form 19 of Appendix A2](#) to the Practice Directions.

Word Document Template

You can download a Word document template of the form [here](#).

(C) Timeline

The Court will direct the Claimant to file this notice by a specified deadline. If the Claimant fails to do so, the Defendant may set the action down for trial or may apply to the Court to dismiss the action.

The Claimant is to serve this notice on all the other parties within 24 hours after the day when the notice is filed.

CHAPTER 6

NOTICE OF OBJECTIONS TO CONTENTS OF AEIC

(OPTIONAL)



What is the purpose of this document?

To object to the contents of the affidavit of evidence-in-chief filed by any other party in the proceedings on the ground of admissibility or other reasons.

You will need to prepare this only if you object to any of the other parties' AEIC document which you have viewed in eLitigation or served to you physically at this stage of the trial.

(A) What You Need to Include in the Notice of Objections to Contents of AEIC

Set out all the objections that will be raised at the trial and all the reasons for each objection.

(B) How to Prepare the Notice of Objections to Contents of AEIC

Standard Form

Prepare this notice based on [Form 18 of Appendix A1](#) to the Practice Directions.

Word Document Template

You can download a Word document template of the form [here](#).

Annotated Sample

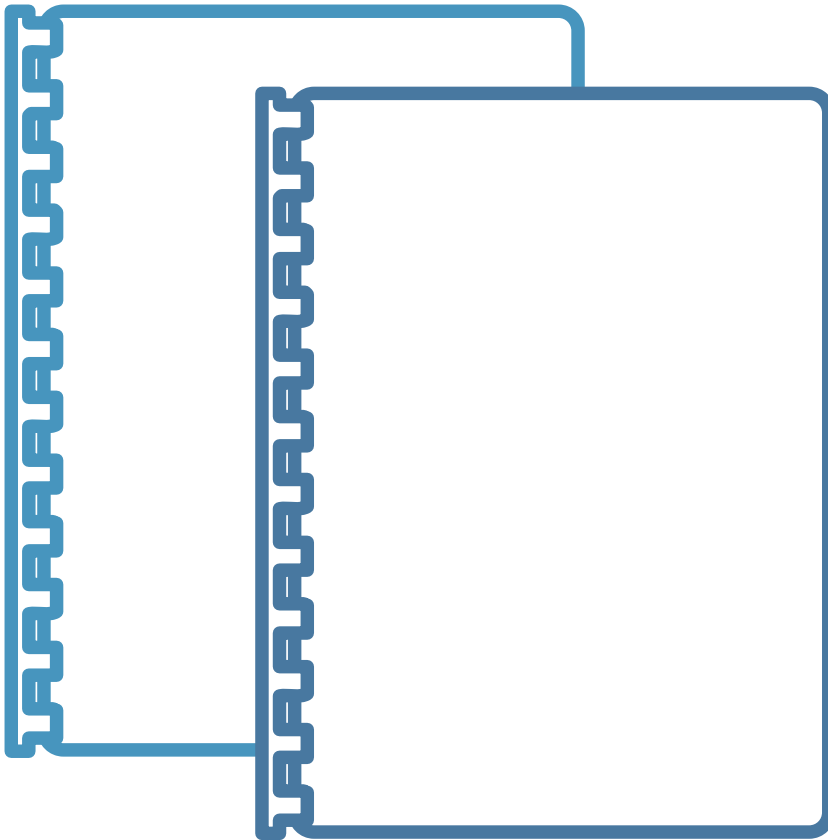
You can view an annotated sample of the Notice of Objections to Contents of AEIC [here](#).

(C) Timeline

File and serve this notice at least 28 days before the first date of the trial.

CHAPTER 7

BUNDLE OF DOCUMENTS



What is the purpose of this document?

To compile and consolidate relevant documents in bundle(s) for ease of reference at trial. This includes documents that have already been exhibited in affidavit(s).

(A) What You Need to Include in the Bundle of Documents

1. General Requirements

Pleadings

Include the last pleading (which incorporates all the previous pleadings).

Court Orders

Include orders of court given at case conferences which are relevant to the trial.

Legible Photocopies

Clear and legible photocopies of original documents may be exhibited. The originals should be made available for inspection by the other parties or the Judge upon request.

Table of Contents

Include a table of contents with the following specifications:

- > For multiple volumes, a table of contents for all volumes must be placed at the beginning of Volume I, and each volume must also contain its own table of contents.
- > Use the format prescribed in [Form 21](#) (Agreed Bundle) or [Form 22](#) (Disputed Bundle) of Appendix A1 of the Practice Directions.

Include these documents:

- > Include relevant documents which the parties are relying on for the trial, separated into sections for documents of which (1) authenticity is not in dispute; and (2) authenticity is in dispute.
- > Where parties cannot agree on the relevance of documents, they are to raise objections before the trial judge.
- > Do not include repeat documents or undisclosed documents (see [Order 11](#) of the Rules of Court 2021).

DO NOT include these documents:

For the avoidance of doubt, the affidavits of evidence-in-chief, Opening Statement, Bundle of AEICs and Bundle of Authorities should be filed or tendered as *separate* documents. Please do not include them in the Bundle of Documents.

2. Agreed Bundle

Parties should prepare a bundle of agreed documents. This requires that you discuss with the other party or other party's lawyer on what the agreed documents are, before the trial date.

The scope of the agreement must be stated in the table of contents.

3. Party's Respective Bundle

If you wish to rely on or refer to a document which the other party does not agree to include in the bundle of agreed documents, you may prepare your own bundle of documents (labelled, for instance, the "[Claimant's/Defendant's] Bundle of Documents") and tender this to the Court, in addition to the Agreed Bundle.

4. Core Bundle

There may be cases where the documents are voluminous and only a selection of documents will be frequently used by parties to make their arguments. This special selection of documents is called a "Core bundle". Where documents are voluminous, parties should try to file a core bundle of documents unless one is clearly unnecessary. This bundle should include only the most important documents that are relevant to the hearing or which will be repeatedly referred to at the trial.

(A) What You Need to Include in the Bundle of Documents *(Cont'd)*

4. Core Bundle *(Cont'd)*

Documents should be cross-referenced to copies of the documents included in the main bundles.

Tender the bundle in a loose-leaf file for easy addition of further documents if required.

Sample:



(B) How to Prepare the Bundle of Documents

Word Document Templates

You can download a Word document template of the Agreed Bundle of Documents [here](#) and the Bundle of Documents [here](#).

Annotated Samples

You can view an annotated sample of the Agreed Bundle of Documents [here](#) and the Bundle of Documents [here](#).

Arrangement

Arrange the documents in chronological order or in some other meaningful order.

Electronic Bookmarks

Create electronic bookmarks in the PDF version for each reference in the table of contents. The name of each bookmark should match the corresponding reference in the table of contents.

Pagination

Number the pages of the bundle consecutively at the top right-hand corner. Each separate volume must start at page 1, and every page must be numbered consecutively.

(C) Timeline

The Court will direct parties to file this by a specified date before the trial, usually around 1-2 weeks before the trial via correspondence. The said correspondence would usually inform parties to submit, in addition, hardcopies of the bundle by a certain date.

(D) Hardcopy

Printing

May be printed on one side or both sides of the page.

Flags

Use flags to mark out documents which will be referred to repeatedly. The flags must be labelled so that it can be located from the table of contents. The flags must also be evenly spaced along the right side of the bundle to avoid overlap. See below for how a flag typically looks like:

Binding

Use red rings or spines for claimants and blue for defendants, with a transparent plastic cover in front and at the back.



Multiple Volumes

Where the bundle consists of more than one volume, the table of contents of all volumes must be placed at the beginning of Volume 1, and each volume must have a table of contents indicating the documents that are contained in that volume.

CHAPTER 8

OPENING STATEMENT



What is the purpose of this document?

To provide a written summary of a party's case and issues to be decided. It helps the Court to appreciate what the case is about and the key matters to look out for at the trial.

(A) What You Need to Include in the Opening Statement

Summary of Case

Provide a brief overview of your case including: (1) the nature of the case; (2) the background facts; and (3) which facts are agreed (and which are not agreed).

Identify Issues

Identify the issues that are in dispute and not disputed, with cross-references as appropriate to the pleadings. Number and list the issues, each in no more than one or two sentences.

Key Documents and Witnesses

Identify the key documents and witnesses supporting each factual assertion.

Legal Authorities

Identify the principal authorities in support of each legal principle.

Reliefs

Explain the orders that you are asking the Court to make (if they are unusual or complicated).

Brevity

Avoid long and elaborate arguments and references to numerous legal authorities.

(B) How to Prepare the Opening Statement

Word Document Template

You can download a Word document template [here](#).

Annotated Sample

You can view an annotated sample of the Opening Statement [here](#).

General Formatting Requirements

- > Include a cover page and table of contents.
- > Page limit of 25 pages (including the cover page, table of contents and all annexes and appendices).
- > Number every page of the Opening Statement by placing the page number at the top right-hand corner of the page.
- > Use minimum font size of Times New Roman 12 or its equivalent.
- > The text must be printed or typed and double-spaced on white paper.
- > Provide a blank margin of not less than 35 mm wide on all four sides of the page.

(C) Timeline

The Court will direct parties to file this document by a specified date, usually around 1-2 weeks before the trial, via correspondence.

(D) Hardcopy

Each page may be printed on one side or both sides.

CHAPTER 9

BUNDLE OF AUTHORITIES



What is the purpose of this document?

To compile and consolidate the legal authorities relevant to the issues in dispute and the party's case.

(A) What You Need to Include in the Bundle of Authorities

Include Copies of the Relevant Legal Authorities

For example, if you are relying on a case authority, please include a copy of that case in the Bundle of Authorities.

Include a Table of Contents For Each Volume

Number the items in the table of contents sequentially, and arrange them in the following order:

- > Statutes and subsidiary legislation (in alphabetical order)
- > Cases (in alphabetical order)
- > Secondary materials (such as textbooks) and other materials (in alphabetical order)

Each authority shall contain a concise statement of its relevance to the issues before the Court, expressed in no more than three sentences. For example, if you are relying on a case for the proposition that a contract is formed when an offer is made and accepted, this should be stated.

(B) How to Prepare the Bundle of Authorities

Word Document Template

You can download a Word document template [here](#).

Annotated Sample

You can view an annotated sample of the Bundle of Authorities [here](#).

Electronic Bookmarks

Create electronic bookmarks for each authority. The name of the bookmark should correspond with the name used in the table of contents.

Pagination

Number every page in the bundle at the top right-hand corner of each page. Each separate volume must start on page 1, and every page in that volume must be numbered consecutively.

(C) Timeline

This may be prepared after the trial but the Court may also direct parties to file this document by a specified date, usually around 1-2 weeks before the trial, via correspondence. The said correspondence would usually inform parties to submit hardcopies of the bundle by a certain date. Unless otherwise directed by the Court, there is generally no need to file the Bundle of Authorities on eLitigation.

(D) Hardcopy

Binding

Use red rings or spines for claimants and blue for defendants, with a transparent plastic cover in front and at the back.

Flags

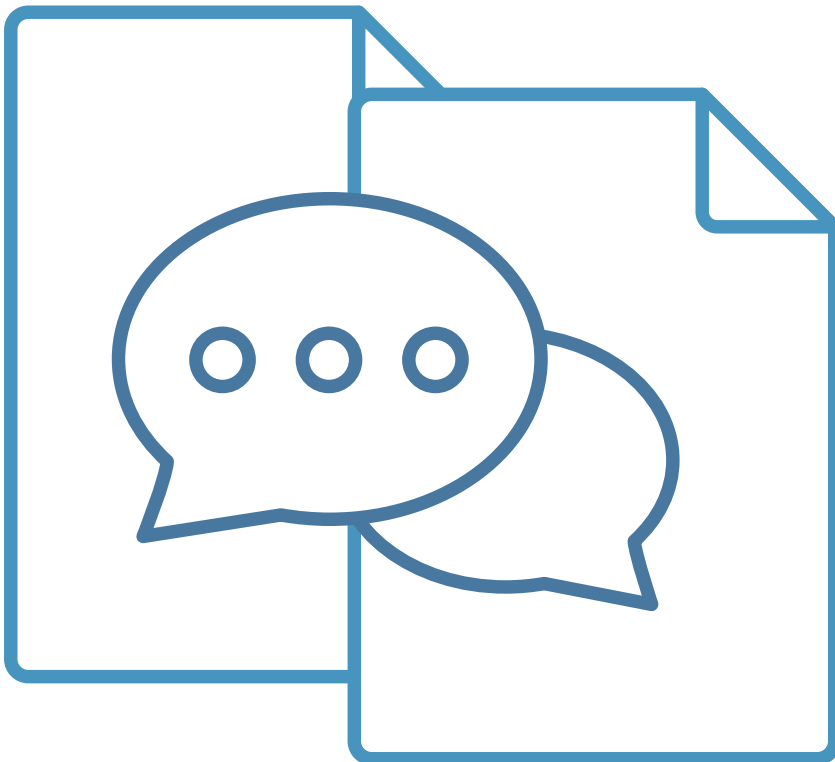
Use flags to mark out the authorities. The flags must be labelled so that each authority can be located from the table of contents. Ensure that the flags are evenly spaced out along the right side of the bundle to avoid overlap.

Sample:



CHAPTER 10

CLOSING SUBMISSIONS



What is the purpose of this document?

To present final arguments on a party's case based on the evidence heard at trial and the legal authorities.

(A) What You Need to Include in the Closing Submissions

State the arguments relevant to the issues in dispute based on the relevant evidence and legal authorities.

You should explain how the Court should assess the relevant evidence and legal authorities and why the Court should rule in your favour.

(B) How to Prepare the Closing Submissions**Word Document Template**

You can download a Word document template [here](#).

Annotated Sample

You can view an annotated sample of the Closing Submissions [here](#).

General Formatting Requirements

- > Prepare the Closing Submissions in a text-searchable PDF and file them on eLitigation.
- > Number every page by placing the page number at the top right-hand corner of the page. The page numbers on the hardcopy version shall correspond to the page numbers in the PDF version.
- > Use minimum font size of Times New Roman 12 or its equivalent.
- > The text must be printed or typed and double-spaced on white paper.
- > Provide a blank margin of not less than 35 mm wide on all four sides of the page.
- > Include appropriate headings and a table of contents if the submissions are lengthy.

(C) Timeline

The Court will direct parties to file this by a specified date at the end of the trial if the Court decides to receive closing submissions in writing.

**SG
Courts**

**STATE
COURTS**
SINGAPORE

1 Havelock Square
Singapore 059724
Tel: 6 JUSTICE (65878423)
www.judiciary.gov.sg