

Scheduled Date for Mediation:

**CONFIDENTIAL MEDIATION MEMORANDUM**

**CAUSE NO:**

**STYLE:**

**COURT:**

**Under the Rules for Mediation, you may either fill out this form or prepare your own Confidential Mediation Memorandum, so long as the mediator is informed of the essential facts of the case, (agreed to and disputed facts), concerning both liability and damages.**

1. Names, titles, addresses and telephonic numbers of parties Plaintiff and settlement representatives and attorneys of record:

2. Names, titles, addresses and telephone numbers of parties defendant and settlement representatives and attorneys of record:

3. Names, titles, addresses and telephone numbers of other parties necessary to resolve the matter (please specify, "intervenor", "subrogee", "insurance carrier", etc.) (identify authorized representatives, if known) and attorneys of record:

4. The nature of the Plaintiffs' claims, (please disclose both agreed to and disputed facts):

5. The nature of the Defendants' defenses and counterclaims, (please disclose both agreed to and disputed facts):

6. Please disclose all counter-claims or cross claims, ((please disclose both agreed to and disputed facts):

7. Please disclose all calculation of damages sought in claims and counterclaims, (please disclose both agreed to and disputed facts):

8. Status of discovery, (i.e. none, some discovery, discovery is complete:

9. Current trial date, if any?

10. What additional information do you need to form a realistic settlement position?

11. Disclose the last offer and counteroffer, if any:

12. Disclose legal positions of each party, (i.e. material legal arguments and authorities for both sides).

DATED the day of \_\_\_\_\_ 2006.

Respectfully submitted,

---

Attorney of Record