

Counsel,

Thank you for selecting me as the mediator in this matter. I am looking forward to assisting you and your clients in reaching a full resolution of all issues.

In anticipation of the upcoming mediation session, I have set a pre-session teleconference with you on..... at The dial-in information will be sent to you prior to the conference. This conversation is designed to give us the opportunity to discuss and resolve any threshold issues that might impair a successful process on the scheduled date. This usually takes no more than 20-30 minutes. I do not charge your clients for this part of my preparation work.

The typical agenda includes:

1. The nature of the dispute.
2. The status of any court proceedings.
3. Any outstanding discovery or exchange of other information that could inhibit or enhance mediation, including documents that should be available at mediation.
4. Briefs (if not already submitted): Note: I have found it to be more productive if briefs are exchanged prior to mediation. No formality is required; letter briefs are fine. There will be ample opportunity for confidential communications, but if you wish to send me confidential information supplementing your exchanged brief prior to the session, you may do so by a separate submission.
5. Parties who will be/should be present for mediation; Mediation Disclosure Notification and Acknowledgement form
6. Prior to private caucus sessions, are there any impediments to the parties gathering initially for a few minutes for me to make some introductory remarks?
7. Access to forms for a written agreement.
8. Confirmation of counsel contact information, date, time and place; directions; parking.
9. Any other issues for the good of the session.

As a part of my preparation, usually after fully reviewing any briefs and if time permits, I may contact you individually and confidentially prior to the scheduled session for further information.

Again, I appreciate the opportunity to work together in the positive atmosphere of private mediation. If there are any questions you have, feel free to contact me through this email address or my home office telephone ###). And, of course, my case manager NAME is available to you at ###.

Regards,
Mediator
JAMS