**Judge Denlow’s Agenda for Conference Call with Dial-in Instructions**

**We have scheduled a Conference Call for the above-referenced matter on:**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Please dial NUMBER and request to be connected with the Judge Denlow Conference.**

The Agenda for the Call is:

1)    Mediator’s disclosure—Any questions regarding Judge Denlow’s professional background or prior involvement with Counsel or Parties;

2)  Brief, objective overview of the facts by each Party;

3)  Status of the litigation (fact discovery, expert discovery, dispositive motions, trial date);

4) Prior settlement negotiations, if any;

5) Issues to be resolved (payment terms, confidentiality, scope of release, etc.)

 *See Judge Denlow’s Settlement Checklist/Term Sheet (attached);*

 *See Judge Denlow’s Class Action Checklist, if applicable (attached);*

6) Impediments to settlement (inability to pay, personalities, necessity for other parties such as

 insurance carriers or lien holders, etc.);

7) Explanation of Mediation process and procedures and questions, if any

 *See Judge Denlow’s Mediation Procedures (attached);*

 8) Set due dates of Party Mediation statements, settlement proposals and other background

 information to be exchanged by the Parties with copies delivered to Judge Denlow;

 9) Date(s), start time and location of Mediation Session:

10) Identification of Participants at the Mediation Session with sufficient authority to resolve the

 Matter; and

11) Any other items the Parties wish to discuss.

Call#

JAMS#