

CONFIDENTIAL MEDIATION MEMORANDUM

(counsel for each party should complete this form)

Cause Number [REDACTED]

[REDACTED] vs. [REDACTED]

In the [REDACTED] Judicial District of [REDACTED] County, Texas.

Please provide a confidential Mediation Memorandum and email it back to me detailing the following information. I encourage you to be candid in this Memorandum, especially as it relates to the last item. Please do not copy other counsel or parties on this Memorandum; send it to me only, and I will keep it entirely confidential.

CURRENT TRIAL SETTING:

CONCISE STATEMENT OF YOUR POSITION (facts, law, and practical):

(Please tell me what you believe affects your client's chances of winning at trial.)

STATUS OF DISCOVERY: complete, incomplete, substantially complete.

(In this regard, I encourage you to complete any unfinished, minor discovery matters such as exchanging documents, supplementing interrogatories, etc.)

HISTORY OF SETTLEMENT OFFERS/NEGOTIATIONS:

DO YOU HAVE SUFFICIENT INFORMATION TO MAKE A SETTLEMENT OFFER?

If not, what more information do you need?