

8150 N. Central Expressway, 10th Floor

Dallas, Texas 75206

[shippadr.com](http://www.shippmediation.com/)

214-543-4095 [john@shippadr.com](mailto:john@shippadr.com)

**INTAKE FORM / POSITION STATEMENT**

The following information is requested for two purposes: first, to allow me to identify important issues applicable to this mediation; and second, to allow you to do a pre-mediation inventory of the issues and circumstances that are important. **Please feel free to ignore any questions that you may feel are not applicable at this time. In addition, please feel free to provide any additional information as you may deem necessary or relevant.** Please answer as briefly as you can; if you feel a longer answer is required, identify in the space provided the exhibit that contains such additional information.

**Confidentiality**

As with all communications received by me during the pre-mediation process, all information will be treated with strict confidentiality, and will not be divulged to anyone without specific permission.

*Full* Style of case:

Trial date: First setting?

.

Have all necessary parties been joined in this matter? Yes / No

If no, please elaborate:

How many total/separate caucus rooms will be required?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **DESIGNATE:**  **Plaintiff, Defendant, Intervenor or Affiliation** | **NAME (Attendee): Attorney** | **NAME (Attendee): Client/Representative** | **ZOOM MEDIATIONS ONLY:**  **Please provide your cell phone** | **IN-PERSON, FULL-DAY MEDIATIONS ONLY:**  **Please indicate special dietary need or accommodation** |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

**SETTLEMENTS (prior)**: Have there been any settlements with the parties that are not involved in the mediation? *Yes / No*

If so, please identify the parties and the nature of the settlement with each.

**DEMANDS/OFFERS**: Please either provide copies of demands and offers exchanged between the parties, or state them:

**MEDIATION**: Has this matter been mediated before?  *Yes / No*

If this case has been mediated before, why is this matter being mediated again? What circumstances have changed since the last mediation to make you believe that settlement is more likely now than before?

**DISPUTE**: Please briefly describe the dispute at issue:

**AUTHORITY**: Will a person with authority to fully bind the parties to a settlement attend the mediation?

*Yes / No*

If no, please identify the person whose signature or authority is necessary, and the reason(s) why such person will not be in attendance:

**AUDIO/VISUAL EQUIPMENT**: Will you require any special audio or visual equipment for your mediation presentation? *Yes / No*

If yes, please identify what equipment you require from us:

**DISCOVERY**: What is the status of discovery in this case (*indicate one*)?

Minimal; Some; Substantially complete

What discovery not already completed do you believe must be conducted prior to mediation?

**MOTIONS**: If applicable, are there any motions currently pending before the Court that may have some bearing on the settlement negotiations? *Yes / No*

If yes, please explain:

**RELIEF SOUGHT**: Please state the relief sought by each party (e.g., injunctive relief, damages).

If a party is seeking damages, state the total monetary amount sought and a breakdown of the amounts sought for each category of damages.

**OTHER INFORMATION/ISSUES**: Any other information or other issues relevant to this mediation.

**IF THIS CASE CANNOT BE SETTLED AT MEDIATION, IS THERE ANY NARROWING OF LEGAL ISSUES THAT CAN BE ACCOMPLISHED AT MEDIATION? For example, are there any pre-trial matters that could be agreed upon at mediation, or any discovery disputes that could be addressed?**