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 Dallas, Texas 75206

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**INTAKE / POSITION STATEMENT**

The following information is requested for two purposes: *first*, to allow me to identify important issues applicable to this mediation; *second*, to allow you to do a pre-mediation inventory of the issues and circumstances that are important.

Please answer as briefly as you can; please ignore any questions that you feel are inapplicable. Adversely, if you feel a longer answer/additional information is required, please feel free to provide such information in the space provided.

**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.

**If not already, please email any mediation-related Court Order to** **abi@shippadr.com**.

**Cause #** *(Please write n/a if needed)***:**

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**Style:** Choose One

**Court Designation:** Choose One

**District Number** *(Please write n/a if needed)***:**

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**Name of Judge** *(Please write n/a if needed)***:**

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**Trial Date** *(Please write n/a if needed)***:**

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**First setting?** Choose Yes/No

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

**If “No,” please elaborate:**

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**ATTENDEES**

**Please include the information of all those from your party who will be present at mediation. This is crucial for the success of this mediation and information will not be shared with the other side.**

| **Party** **Designation** | **Name of** **Attending** | **Designate whether Counsel, Rep, Client** | **Address** | **Cell Phone** |
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| Choose One |  |  |  |  |
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| Choose One |  |  |  |  |

**PRIOR SETTLEMENTS**:

**Are there any prior settlements *not* involved in this mediation?** Choose Yes/No

**If “Yes,” please identify the parties and nature of the settlement with each:**

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**DEMANDS/OFFERS**:

Please state any demands and/or offers exchanged between the parties:

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**MEDIATION**:

**Has this matter been mediated before?** Choose Yes/No

**If “Yes,” 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?**

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**DISCOVERY STATUS:** Choose One

**MOTIONS**:

**Please identify any pending Motions that may have some bearing on settlement negotiations:**

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**DISPUTE**:

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

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**RELIEF SOUGHT**:

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

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

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**OTHER INFORMATION/ISSUES**:

**Any other information or other issues relevant to this mediation?**

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**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?

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**AUDIO/VISUAL EQUIPMENT**:

Please email abi@shippadr.com w/any special audio or visual equipment needs.