**Pre-Mediation Conference Call Checklist**

Please be prepared to discuss the following items during our conference call:

- Brief **summary** of case and current status. For example, is a trial date set? any motions pending?

- **Who** will be attending this mediation? Please think about who needs to be present to ensure a productive discussion and a complete resolution.

- Mediation **forma**t: Can we work in joint session? I believe in general that the more the clients are involved together in the mediation, the better the settlement; however, this is not true of every case. Is your client comfortable being in the same room with the other side? Can your client describe the dispute from their perspective to the other side?

- **Scheduling** the mediation: please have some possible dates that you have cleared with your client as well as your own calendar. Mediations are typically scheduled for a day; is there a reason why this case might need more or less time than that?

- **Site** for the mediation: Grand Rapids? My office does not have a conference room, so we can discuss some options.

- Pre-mediation **submissions** to the mediator. Some kind of summary is helpful for me. See my memo, “Writing the Mediation Summary: Items to Consider” on my web-site, [www.abfifer.com](http://www.abfifer.com), under the “Mediation Tools” tab. Will your summary be exchanged with opposing counsel? If so, do you wish to submit a separate confidential statement to the mediator?

- **Preparing** your clients for mediation

- Status of **settlement** discussions to date

- **Impediments** to settlement and how you think I can help you overcome those

- **Non-monetary options** for resolution.

- Permission for me to contact each of you separately prior to the mediation.