

**GENERAL INFORMATION**

<input checked="" type="checkbox"/>	<b>CHECK AS COMPLETE</b>
<input type="checkbox"/>	<b>Case file date</b>
<input type="checkbox"/>	<b>Style</b>
<input type="checkbox"/>	<b>Court</b>
<input type="checkbox"/>	<b>Judge</b>
<input type="checkbox"/>	<b>Connected or related litigation</b>
	<b>Mediation</b>
<input type="checkbox"/>	Ordered or voluntary
<input type="checkbox"/>	Mediation referral initiated by
<input type="checkbox"/>	Prior mediations?
<input type="checkbox"/>	Mediator
<input type="checkbox"/>	Results
<input type="checkbox"/>	Reason for failure
	<b>Trial or Hearing</b>
<input type="checkbox"/>	Current setting
<input type="checkbox"/>	Prior settings \ continuances
<input type="checkbox"/>	Estimated length of trial
<input type="checkbox"/>	<b>Fact finder (jury, judge, arbitrator)</b>
<input type="checkbox"/>	<b>Discovery deadline for fact discovery</b>
<input type="checkbox"/>	<b>Discovery deadline for expert discovery</b>
	<b>Status of dispositive motions</b>
<input type="checkbox"/>	Have you filed
<input type="checkbox"/>	Has the other side filed
<input type="checkbox"/>	Has it been decided
<input type="checkbox"/>	What was the outcome

**LOGISTICS**

<input type="checkbox"/>	<b>Counsel's cell phone number (for use during mediation only)</b>
<input type="checkbox"/>	<b>Caucus rooms needed</b>
<input type="checkbox"/>	<b>Lunches needed</b>
<input type="checkbox"/>	<b>AV needs</b>
<input type="checkbox"/>	<b>Other needs</b>
<input type="checkbox"/>	<b>Disabilities require accommodation</b>
<input type="checkbox"/>	<b>Interpreter needed</b>
<input type="checkbox"/>	<b>Any time impediments for any of your participants</b>
<input type="checkbox"/>	<b>Any authority issues from your side</b>
<input type="checkbox"/>	<b>Other needs</b>

**LIABILITY**

<input type="checkbox"/>	<b>Claimant's claims</b>
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<input type="checkbox"/>	<b>Respondent's affirmative defenses</b>
<input type="checkbox"/>	<b>Counterclaims \ Crossclaims or other relevant claims</b>
	<b>Key liability documents or exhibits</b>
<input type="checkbox"/>	Your side
<input type="checkbox"/>	Opposition
	<b>Key disputed issues</b>
<input type="checkbox"/>	Law
<input type="checkbox"/>	Fact

**DAMAGES**

	<b>Claimant's damages</b>
<input type="checkbox"/>	Actual damages
<input type="checkbox"/>	Compensatory damages claimed
<input type="checkbox"/>	Punitive damages claimed
<input type="checkbox"/>	Pre-judgment interest
<input type="checkbox"/>	Fees
<input type="checkbox"/>	Other forms of damages
<input type="checkbox"/>	Other relief requested
	<b>Counterclaim or other claim damages</b>
<input type="checkbox"/>	Actual damages
<input type="checkbox"/>	Compensatory damages claimed
<input type="checkbox"/>	Punitive damages claimed
<input type="checkbox"/>	Pre-judgment interest
<input type="checkbox"/>	Fees
<input type="checkbox"/>	Other forms of damages
<input type="checkbox"/>	Other relief requested
	<b>Collections issues</b>
<input type="checkbox"/>	Are any issues anticipated
<input type="checkbox"/>	Will any issues be claimed
<input type="checkbox"/>	<b>Non-monetary relief</b>
	<b>Best day</b>
<input type="checkbox"/>	Claimant's
<input type="checkbox"/>	Respondent's
<input type="checkbox"/>	Other
	<b>Key damages documents or exhibits</b>
<input type="checkbox"/>	Your side
<input type="checkbox"/>	Opposition
	<b>Key disputed issues</b>
<input type="checkbox"/>	Law
<input type="checkbox"/>	Fact
<input type="checkbox"/>	<b>Liens or other special considerations</b>

**FEEES AND EXPENSES**

	<b>To date</b>
<input type="checkbox"/>	Fees

<input type="checkbox"/>	Expenses
	<b>Expected through determination</b>
<input type="checkbox"/>	Fees
<input type="checkbox"/>	Expenses
	<b>Other considerations</b>
<input type="checkbox"/>	Contingency involved
<input type="checkbox"/>	Terms

### READINESS FOR MEDIATION

<input type="checkbox"/>	<b>Do you have sufficient information to evaluate your claims and their claims to make an intelligent decision?</b>
<input type="checkbox"/>	<b>Do the other parties?</b>
<input type="checkbox"/>	<b>Are all of the necessary parties in the case or participating in mediation?</b>

### PRIOR NEGOTIATIONS

<input type="checkbox"/>	<b>Initial Demands \ Offers</b>
<input type="checkbox"/>	<b>Discussions since</b>
<input type="checkbox"/>	<b>Last discussion</b>
<input type="checkbox"/>	<b>Who should make the first offer or demand in mediation</b>

### MEDIATION SPECIFICS

<input type="checkbox"/>	<b>What is your client's personality like</b>
<input type="checkbox"/>	<b>What is the opposing party like</b>
<input type="checkbox"/>	<b>How is your relationship with opposing counsel</b>
<input type="checkbox"/>	<b>Is there a need for a joint session</b>
<input type="checkbox"/>	<b>What issues, if any, would there be with a joint session if needed</b>
<input type="checkbox"/>	<b>Who will attend for your client</b>
<input type="checkbox"/>	<b>Who do you expect to attend from the other side</b>
<input type="checkbox"/>	<b>Is there anyone who needs to be involved from the other side you don't anticipate participating</b>
<input type="checkbox"/>	<b>Are there any special impediments to settlement</b>
<input type="checkbox"/>	<b>Other considerations for resolution – emotional or non-monetary issues</b>
<input type="checkbox"/>	<b>What does the other side care about besides money that might be relevant at mediation</b>