

## Pre-mediation conference call

1. Brief summary of the case
2. Procedural posture of the case
3. Settlement discussions
4. Obstacles to settlement
5. The Parties' goals and interests
6. Ancillary issues (if any) – such as confidentiality of settlement, taxation of settlement, etc.
7. Who's attending?
8. Briefing – exchanged or confidential; timing of exchange; length of memos; other documents?
9. What additional information is needed, if any, to settle this case?
10. Logistics – date, time, payment arrangements, ending time,
11. Interpersonal dynamics, special issues
12. Discussion of initial joint session – substantive? will parties participate? subsequent caucusing? meetings with just counsel?
13. Conflicts of interest or disclosures?
14. Observers?
15. Anything else?