

DATE        2014

Party One

Party Two

Party Three

**MEDIATION DATE:**

**VENUE:**

**START TIME:**

1. This memo should be read in conjunction with the Mediation Agreement attached to this correspondence.
2. The mediation process gives each party the opportunity to manage and control their dispute negotiations. It allows the parties to:
  - make an objective and considered reassessment of their problem
  - focus on each sides needs and interests
  - in a voluntary and confidential process
  - that maximizes the opportunity of reaching a settlement.
3. As set out in clause 2.4 of the Mediation Agreement it is **essential** that each party or their representative has full authority to settle the dispute on their behalf at the mediation.
4. Prior to the mediation I request that each party **e-mail me no less than 2 days prior to the mediation** a brief summary of their position.  
**This summary may be exchanged with the other party or parties at your sole discretion.**

The summary should advise;

- What are the facts of the problem from their perspective?
- What are the issues that need to be discussed and settled?
- What proposals, if any, they may have for a settlement. **These will be received by me on an absolutely confidential basis.**
- If appropriate a schedule of assets and liabilities providing values (agreed or not agreed) together with a summary of any valuation evidence.
- **Advice of who will be attending the mediation with you.**

**At the start of the mediation the mediator will provide an introduction outlining the process and then ask each party to make an opening statement setting out their view of the dispute either personally or by way of their Counsel.**