**CONFIDENTIAL MEDIATION MEMORANDUM**

(counsel for each party should complete this form)

Cause Number \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ vs. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

In the \_\_\_\_\_\_\_\_ Judicial District of \_\_\_\_\_\_\_\_ County, Texas.

Please provide a confidential Mediation Memorandum and email it back to me detailing the following information. I encourage you to be candid in this Memorandum, especially as it relates to the last item. Please do not copy other counsel or parties on this Memorandum; send it to me only, and I will keep it entirely confidential.

**STATUS OF DISCOVERY** - complete, incomplete, substantially complete: In this regard, I encourage you to complete any unfinished, minor discovery matters such as exchanging documents, supplementing interrogatories, etc.):

**DO YOU HAVE SUFFICIENT INFORMATION TO MAKE A SETTLEMENT OFFER?**

IF NOT, WHAT MORE DO YOU NEED?

**HISTORY OF SETTLEMENT OFFERS/NEGOTIATIONS:**

**CONCISE STATEMENT OF YOUR POSITION** (facts, law and practical) Tell me what you believe affect’s your client’s chances of winning at trial: