Mediation Position Statement

*This statement is made solely for the purposes of a mediation of this dispute. It is **without prejudice** to any proceedings and may not be referred to or relied upon within any such proceedings.*

*It is **confidential** to the parties and to the Mediator, and so will be shared between parties and copied to the mediator, prior to the mediation.*

When responding to the questions below, please use continuation sheets if necessary.

Name:	
Company Name:	
Address:	
Contact Telephone Number:	
Reference:	

Signature .... Date.............................

Q1. What is the background to the dispute?

Please provide a summary of how the dispute arose, including details of any relevant contracts, the nature of the claims and any defences against them.

Also, please describe your business, if applicable and explain the relationship with the other party. Please provide references to corporate websites if applicable.

Summary of how the dispute arose

Chronological list of key dates in the dispute

Please note any correspondence between the other party or their advisor(s)
Copies of such supporting documentation will be included in the Mediation Bundle.

Q2. What are the key issues from your perspective which have prevented settlement of the dispute?

List of those issues upon which you have since reached agreement with the other party:

Q3. What information or argument would cause the other party to change its position on this dispute?

Q4. What would cause you to change your position?

Q5. What offers have been made to date?

Note: please supply the date and, if relevant, the amount of the offer and whether it is still open

List of the offers made by you to the other party:

List of the offers made to you by the other party:

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Q6. Cost estimates

	<u>Excluding VAT</u>	<u>Including VAT</u>
What are your estimated costs up to and including the mediation?		
What is your best estimate of your total costs and disbursements up to and including any court action or litigation?		

Q7. Who is participating on your side of the dispute?

<u>Name</u>   <u>Role</u>

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