

MODEL MEDIATOR'S OPENING STATEMENT

Good afternoon, my name is _____ and I am serving as your mediator today. I am a [certified*] mediator trained to assist in resolving disputes such as the one before us today. I am pleased to be here to assist you in working through your issues and believe you will find mediation to be a very helpful process. Thank you for committing to be here today.

If any of you have a special need during the session, please let me know now or at any time during this session. Also, please silence all electronic devices during this mediation.

How would each of you like to be addressed in our session today?

Do you have the authority to settle and sign an agreement if one is reached?

Let me begin by stating that I am not acquainted with the parties involved in this dispute.

Have any of you met me before this session?

Mediation is a voluntary process in which a neutral, impartial person assists parties who want to generate options for resolving their issues.

Are you all here voluntarily?

My role as the mediator is to facilitate the discussion and negotiation and help you capture any agreement into appropriate settlement terms. Your attendance at this mediation does not imply any admission of guilt or wrongdoing. If you would like to take a break, meet with me privately, or end the mediation, please let me know and we'll address those matters at that time.

My goal is to assist each of you in communicating clearly with one another and reaching a mutually acceptable settlement of this matter. I am not here to represent any particular side and will not provide advice or guidance. You are entitled to seek representation and subject matter experts that can be called to provide information, if necessary. I have no power to impose a decision on you or to decide how this matter should be settled. This is where mediation differs from other forms of dispute resolution. You are empowered with the ability to design your own solution that meets your needs and addresses your interests.

Did each of you receive a letter or in-brief outlining what you can expect in a mediation session and asking you to verify that you willingly accept the opportunity to participate?

Each of you signed agreements to participate in good faith. "Participating in good faith" means that you are entering with an open mind, that you will be respectful of the other person, and that you will listen to one another.

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Scott C. Dulebohn



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