

IN THE CIRCUIT COURT FOR CHARLES COUNTY
CONFIDENTIAL PARTICIPANT STATEMENT
FOR SETTLEMENT CONFERENCES OR MEDIATION

Case No.: _____ **Date:** _____

Case Type: _____

Submitted by: _____ **Attorney for:** _____

Attorney's Name **Plaintiff / Defendant**

Firm

Attorney's Address

City **State** **Zip Code**

Attorney's Telephone Number **Party's Telephone Number**

1. Describe the nature of the case: _____

2. Describe any equitable relief being sought: _____

3. With respect to the issue of liability, please complete the following:

A. Does the case involve an affirmative defense? _____ **Yes** _____ **No**

If yes, what affirmative defense? _____

B. Describe the conduct of the plaintiff that might bar or diminish any recovery:

C. Describe the factual basis of any legal defense that might bar or diminish any recovery by the plaintiff: _____

4. Provide a concise statement of any other claims (cross-claims, counterclaims, or third party claims) and respective defenses thereto: _____

5. If this is a personal injury or wrongful death action, plaintiff shall complete the following:

A. Nature and extent of injuries: _____

B. Permanent injuries being claimed: _____

C. Nature and any surgical procedures recommended and/or scheduled: _____

D. Total medical expenses to date: \$ _____

E. Future medical expenses: \$ _____

F. Loss of earnings to date - amount: \$ _____

For what period: _____

G. Future loss of earning - est. amount: \$ _____

H. Other special damages (give nature and amount): _____

I. General damages (give nature and amount): _____

J. Punitive damages: _____

6. ALL PARTIES: State the area(s) of specialization of all expert witnesses you would call to establish your claim or defense: _____

7. If this is not a personal injury case, each plaintiff shall state the following with respect to each alleged item of damages:

A. Identify each item of damage claimed that will be supported by documentary evidence (type and amount): _____

B. Identify each item of damage claimed that will not be supported by documentary evidence (type and amount): _____

8. If you are a plaintiff in this action, state the terms of your demands actually communicated to the defendant in order to settle this matter: _____

9. What figure are you willing to settle for, whether or not communicated to the other side: _____

10. If you are a defendant in this action, state the terms of your offer in order to settle this matter: _____

11. What figures are you willing to offer, whether or not communicated to the other side: _____

12. Describe the status of any previous settlement negotiations not set forth in your answers: _____

13. Describe any other information you feel relevant to the negotiated settlement of this case; please list pending motions: _____

Signature of Attorney

Date

Signature of Party

Date