

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

Re: [Case Name vs. Case Name]; Case No. [Court Case Number]

Dear [Counsel Last Name],

I am writing to formally propose that the parties submit the above-referenced matter to private mediation. Given the current stage of litigation and the anticipated costs of ongoing discovery and motion practice, we believe that an early resolution through alternative dispute resolution would be in the best interests of all corporate entities involved.

We believe that a neutral third party could assist in narrowing the legal issues and facilitating a commercially reasonable settlement. To this end, we suggest the following mediators for your consideration:

- [Mediator Name 1] - [Firm/Organization]
- [Mediator Name 2] - [Firm/Organization]
- [Mediator Name 3] - [Firm/Organization]

Please review these options with your client and let us know if any of these individuals are acceptable, or feel free to provide a list of your preferred mediators. We are generally available during the weeks of [Date Range] for a mediation session.

This proposal is made for settlement purposes only and is governed by [State/Federal] Rule of Evidence 408 regarding the confidentiality of compromise negotiations.

I look forward to hearing your thoughts on this proposal.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email Address]

cc: [Client Representative Name]