[Date]

[Mediator Name]
[Mediation Firm/Organization]
[Address]
[City, State, Zip]

RE: Confidential Mediation Statement and Instructions
Case Name: [Case Name/Style]
Matter Number: [Matter Number]

Dear [Mediator Last Name],

This letter serves as a confidential outline of our settlement conference strategy for the upcoming mediation scheduled on [Date].

1. Executive Summary
The primary objective of [Client Name] for this session is [Objective: e.g., total resolution/narrowing of issues]. We believe the core obstacle to settlement is [Main Obstacle].

2. Strengths and Weaknesses
Our evaluation of the case highlights the following:
- **Strengths:** [List key legal or factual advantages]
- **Vulnerabilities:** [Identify risks we are prepared to address]

3. Settlement History and Current Position
- **Prior Offers:** [Detail previous settlement discussions]
- **Opening Move:** We intend to open with [Amount/Term].
- **Target Range:** Our realistic settlement goal is between [Lower Bound] and [Upper Bound].

4. Strategic Approach and Tone
Our strategy for this conference is [Strategy: e.g., distributive/integrative/evaluative]. We wish to maintain a [Tone: e.g., firm/cooperative/conciliatory] tone. We request that you [Specific instruction to mediator: e.g., focus on the cost of litigation / address the emotional aspects of the dispute].

5. Non-Monetary Interests
Beyond the financial figures, the following terms are critical to a deal:
- [e.g., Confidentiality/Non-Disparagement]
- [e.g., Future business relationship]
- [e.g., Structured payment timeline]

6. Logistical Preferences
- [e.g., Request for joint session or immediate caucus]
- [e.g., Time constraints for the day]

We look forward to working with you to reach a resolution.

Sincerely,

[Your Name]
[Your Law Firm/Company]
[Contact Information]