[Date]

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

RE: [Case Name/Style of Cause]
Court File No.: [File Number]
Mediation Date: [Date]

Dear [Mediator Name],

I represent the [Plaintiff/Defendant] in the above-noted medical malpractice action. This letter serves as our formal Letter of Instruction and brief for the upcoming settlement conference scheduled for [Date].

1. Introduction
This matter involves allegations of medical negligence arising from [briefly describe the medical procedure or incident] which occurred on [Date] at [Facility Name].

2. Liability and Standard of Care
The [Plaintiff/Defendant] position regarding the standard of care is as follows:
[Insert summary of key medical expert opinions and alleged breaches or defense of care.]

3. Causation and Damages
The alleged injuries include [list primary injuries]. We have enclosed the following expert reports regarding the causal link between the medical treatment and the resulting damages:
[List specific medical expert reports.]

4. Current Status of Litigation
Discoveries were completed on [Date]. All relevant medical records have been produced. The parties are now seeking a mediated resolution to avoid the costs and risks associated with a [Number]-day trial.

5. Settlement Objectives
The [Plaintiff/Defendant] enters this mediation in good faith. Our primary objectives are:
- To reach a full and final release of all claims.
- To address [specific lien or subrogated interest issues].
- [Insert other specific objectives].

6. Participants
The following individuals will be attending with full authority to settle:
- [Name], Senior Associate Counsel
- [Name], Representative for [Party/Insurer]

Enclosed please find our Mediation Brief containing the relevant pleadings and medical expert excerpts. We look forward to your assistance in resolving this matter.

Yours truly,

[Your Name]
Senior Associate
[Law Firm Name]