IN THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF ILLINOIS

Click here to enter text.,)
Plaintiff(s),)
vs.	CIVIL NO. Click here to enter text.
Click here to enter text. Defendant(s).)))

SETTLEMENT STATEMENT OF Click here to enter text., ATTORNEY FOR Click here to enter text.

This Settlement Statement is submitted *ex parte* pursuant to Order of the Court and shall not become a part of the official court file. Neither this statement nor communication during the settlement conference with the settlement judge can be used by any party in the trial of the case. This statement should not exceed six (6) pages in length.

What is your position and authority on settlement?

Your position or interpretation of the factual issues:

The issues of law you believe need to be decided by the finder or fact and/or the Court:

Name of Trial Attorney(s) or Pro Se Litigant:

Name of person with ultimate settlement authority who will be present at the Settlement Conference or who will be readily and immediately available. If insurance is involved, include name of carrier and name of its representative with unrestricted authority. If more than one carrier:

Nature of relief requested (including damages, declaratory relief, injunctive relief, etc):

Nature and extent of injuries, if applicable:

If there is any confidential information that affects the value of the case, provide it (explain why the information cannot or should not be disclosed and how to persuade the other side on the valuation of the case, if the opponent does not have this information):

Provide a description of the strength of your positions on each claim and the facts which support the claims.

Provide a description of the weakness of your positions on each claim and the facts which support your opponent:

Outline of your discovery plan including your estimate of the total number of

depositions you expect to take:

Nature and extent of discovery completed to date:

Your estimate of the <u>total</u> expenses to your client to the present and through trial including (a) legal fees, (b) travel expenses, (c) expert witness fees and expenses, (d) cost of deposition transcripts, (e) witness fees, and (f) any other foresee able miscellaneous expenses:

If there is ancillary litigation that is pending or planned that affects the value of the case, identify it and the potential value:

List information about any liens (state whether the liens are verified, negotiable, whether a representative of the lien holder needs to be present):

If there is valid insurance coverage, provide the limits; any deductibles; and any amounts that have been expended toward the limit of coverage:

List any attorney's fees and other expenses relevant to the case:

Summarize settlement discussions you have had with opposing party including demands and offers:

Date of last settlement discussion:

DATED: Click here to enter a date.

Provide the settlement value you want to start with:

Why?

Provide the settlement value you want to end with:

Why?

What specific provisions need to be included in the settlement (if you have a standard form, provide it):

Plaintiff: If settlement is reached, where should payment be sent?

Defendant: If settlement is reached, what process is necessary for execution of settlement; approximately how long will it take for the closing documents/check to be received?

If settlement is not reached, what else do you anticipate needs to be done before trial?

SIGNED:			