

## **MEDIATION PREPARATION GUIDE**

### **PREPARED BY**

**Michael W. Hawkins, Esq.**  
**Partner**  
**Dinsmore & Shohl LLP**  
**1900 First Financial Center**  
**255 East Fifth Street**  
**Cincinnati, OH 45202**  
**513-977-8270 (Phone)**  
**513-977-8141 (Fax)**  
**[michael.hawkins@dinsmore.com](mailto:michael.hawkins@dinsmore.com)**

# Preparation Guide for Mediation

Please provide a brief response to the following questions in preparation for the mediation to be mediated by Michael W. Hawkins, Esq. The Mediator will not share this document with either party and you should not send a copy to either party. It will assist you and the Mediator in the mediation. Please return to Michael W. Hawkins, Esq., 255 E. Fifth Street, Suite 1900, Cincinnati, Ohio 45202; or FAX to (513) 977-8141; or e-mail: michael.hawkins@dinsmore.com.

## Interests

What are your interests in this matter?

What do you believe the other side's interests are?

What are your shared interests?

## Alternatives

What do you believe your alternatives are to a resolution of this matter?

What do you believe their alternatives are to a resolution of this matter?

**Options**

List options that you believe will bring about an agreement to reconcile your interest and their interest.

**Legitimacy/Fairness**

What standards or criteria could be used to establish a fair agreement?

What fair procedure could be used to establish a fair agreement?

**Relationship**

What kind of relationship would you like to have with the opposite side?

What can you do to develop that relationship?

**Communication**

What tone do you want to set for the mediation?

Is an apology in order?

How can you be sure you understand the other side?

How can you be sure that the other side understands you?

**Commitments**

Are you committed to resolving this matter during the mediation session?

If the mediation is concluded and successful, what should be included in a well-crafted commitment by you and by them?

Submitted by: \_\_\_\_\_

Date: \_\_\_\_\_