



1 A request for an exception to the foregoing personal attendance requirements must be  
2 filed and served on all parties at least 14 days before the settlement conference.

### 3 **PREPARATION FOR SETTLEMENT CONFERENCE**

4 In preparation for the settlement conference, each party must submit a confidential  
5 settlement conference statement for in camera review. The statement must contain the following:

- 6 1. A brief statement of the nature of the action.
- 7 2. A concise summary of the evidence that supports your theory of the case,  
8 including the names of individuals disclosed pursuant to Rule 26(a)(1)(A)(i), the Rule  
9 26(a)(1)(A)(iii) computation of damages, and the Rule 26(a)(1)(A)(iv) insurance information.  
10 You must provide all information which documents or supports your damages claims. Copies of  
11 medical records or treatment records need not be submitted but, rather, must be provided in a  
12 table or summary format.
- 13 3. Attach to your statement any documents or exhibits that are relevant to key factual  
14 or legal issues, including selected pages from deposition transcripts or responses to other  
15 discovery requests.
- 16 4. An analysis of the key issues involved in the litigation. The analysis must include  
17 a discussion of the strongest points in your case, both legal and factual, and a frank discussion of  
18 the weakest points as well. The court expects you to present a thorough analysis of the key issues  
19 and candid evaluation of the merits of your case.
- 20 5. Identify and explain any obstacles to settlement, e.g. medical liens, statutory caps,  
21 or motions pending before the court.
- 22 6. The history of settlement discussions, if any, which have occurred in this case.  
23 Provide any demands, offers, or offers of judgment that have been made and, if applicable, the  
24 reasons they have been rejected. Attach a copy of all settlement correspondence, including all  
25 written demands or offers and responses to the offers.

