

## NOTICE TO COUNSEL

ALL PARTIES SHALL BE COUNSELED BY THEIR RESPECTIVE ATTORNEYS SO AS TO BE PREPARED TO CONSIDER SETTLEMENT REASONABLY REFLECTIVE OF THE ISSUES IN THIS CASE, THE EVIDENCE BEARING THEREON, THE APPLICABLE LAW AND THE RANGE OF POSSIBLE RESULTS IN AN ADJUDICATION.

EACH PARTY NECESSARY TO CONSIDERATION OF SETTLEMENT SHALL BE IN COURT AT THE TIME SET FORTH ABOVE.

AT LEAST TWO (2) DAYS BEFORE THE CONFERENCE DATE, EACH PARTY SHALL SUBMIT TO CHAMBERS A MARKED CONFIDENTIAL EX PARTE STATEMENT OF THE FOLLOWING:

1) ALL CLAIMS; 2) FACTUAL BASIS FOR CLAIMS (INCLUDING DAMAGES); 3) RANGE OF POSSIBLE RECOVERY; 4) PROBABLE RANGE OF RECOVERY; 5) PROSPECTS FOR SUCCESS AND REASONS THEREFOR; 6) SETTLEMENT DEMANDS/OFFERS INCLUDING THE ELEMENTS AND STRUCTURE OF POSSIBLE SETTLEMENT.