

Take Away Tips

- Preparation – know the law, facts and venue
- Choose an appropriate mediator/arbitrator
- Define your objectives and execute on them
- Get something for every concession
- Understand your adversary's motives
- Be patient
- Know your style and use it to your advantage (i.e. principal to principal negotiations, schmoozing, good cop/bad cop)
- The Settlement Agreement drafting process – memorialize critical terms immediately after settlement is reached and have all parties sign
- Take control of the drafting process

