

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

**Instructions for Preparing Confidential Settlement Conference Memorandum
for Special Masters Settlement Conference**

1) ATTENDANCE

Trial counsel must attend the settlement conference, unless excused by the Court. The Special Master(s) are not authorized to excuse trial counsel from attendance.

In addition, trial counsel shall be accompanied by a person or persons authorized to accept or reject a settlement proposal of the Master(s).

2) SETTLEMENT CONFERENCE MEMORANDUM

Ten (10) days prior to the scheduled settlement conference with the Special Master(s), each party shall submit to each Master a concise memorandum of facts and law. The memorandum is not to be filed with the Clerk's Office and is not required to be served on opposing counsel. However, a Notice of Service of the settlement conference memorandum indicating service on the Special Masters shall be filed with the Clerk's Office to whom the Judge is assigned. The Confidential Memorandum shall not exceed five (5) pages and shall set forth the following:

- (a) Trial Counsel: List the names, addresses, telephone numbers and email addresses of the attorneys who will try the case.
- (b) Jurisdiction: Set forth the basis of federal jurisdiction.
- (c) Jury-Non-Jury: State whether the case is a jury or bench trial.
- (d) Nature of the Case: State separately the nature of each cause of action and the relief sought.
- (e) Plaintiff's Contentions: State generally the plaintiff's factual contentions with respect to each cause of action.
- (f) Defendant's Contentions: State generally the defendant's factual contentions with respect to defenses, counterclaims and set-offs.

(g) Legal Issues: List the legal issues presented by the factual contentions of the parties.

(h) Status of Discovery Procedures.

(i) Settlement Demands.

(j) Estimate of Trial Time.

(k) Personal Injury Cases: Set forth nature of injuries, all special damages, loss of income, anticipated future expenditures, degree of permanent injuries, economic appraisal of destruction of earning capacity, life expectancy, etc.

(l) Additional Information: Any matters which might aid the Special Masters in settling the case.

3) CONFIDENTIALITY

Settlement conference memoranda, and oral information disclosed to the Special Masters during the settlement conference, shall be regarded as confidential by the Special Master(s), shall not be associated with the court file of the case, and shall not be disclosed to any person who is not a participant in the settlement conference.

4) VIOLATION OF ORDER

The Special Master(s) must report to the Court any violation of this Settlement Conference Order.

5) SETTLEMENT CONFERENCE REPORT

At the conclusion of the Settlement Conference, the Special Master(s) shall file with the Court a Special Masters Settlement Conference Report which shall set forth the names of those attending the conference, violations, if any, of the Settlement Conference Order, and whether or not the case has been settled.

BY THE COURT
DINAH MILTON KINNEY, CLERK