

MEDIATOR'S DISCLOSURE STATEMENT

Parties to dispute: <PARTY ONE> and <PARTY TWO>

Attorneys: <ATTORNEY ONE> of <LAW FIRM ONE>

<ATTORNEY TWO> of <LAW FIRM TWO>

Other Participants or
Interested Parties:

This disclosure statement is provided pursuant to the Illinois Uniform Mediation Act, Section 9. The statute requires that a mediator, before accepting a mediation, disclose information that a reasonable person would believe could affect the mediator's impartiality. This includes, but is not limited to, the mediator's personal or financial interest in the outcome of the dispute being mediated and information concerning the mediator's past or present relationship with any party to the dispute or other participant in the mediation.

The parties are requested, at the earliest possible date, to provide the names of individuals who will be participating in the mediation along with any additional information that they believe must be disclosed to comply with the Illinois Uniform Mediation Act.

The following matters are being or have been disclosed prior to acceptance of this mediation:

General:

The mediator, Michael J. Leech, is an attorney. He does not and will not undertake to act as counsel for any party or any participant in the mediation or to represent the interests of any party or participant. He handles legal matters relating to employment and represents both employers and employees in disputes concerning employment.

Mr. Leech was formerly a partner in the law firm of Hinshaw & Culbertson LLP, which had offices in many cities. Hinshaw principally represented businesses, insurance carriers and not-for-profit entities. It had over 400 attorneys in offices in 12 States. In his own practice, Mr. Leech represented individuals, businesses, not-for-profit entities and only occasionally insurance carriers.

Personal or Financial Interest in Outcome of Mediation:

None.

Past or Present Relationships With Parties:

Mr. Leech does not presently represent or act as counsel for any party in this dispute, nor does he represent a party with interests adverse to any party to this dispute.

Mr. Leech has not represented or acted as counsel for any party in this dispute in the past, nor has he acted as counsel to a client with interests adverse to those of any party to this dispute, to the best of his knowledge and recollection [**OR DISCLOSURE OF CIRCUMSTANCES AND TIMING OF REPRESENTATION**].

Past or Present Relationships With Participants:

Mr. Leech has conducted **XXX** mediations in which **<ATTORNEY ONE>** was a participant as counsel for a party and **XXX** mediations in which **<ATTORNEY TWO>** was a participant as counsel for a party.

Mr. Leech knows **<ATTORNEY ONE>** or **<ATTORNEY TWO>** as a result of participating in bar and continuing legal education activities with **<HIM/HER>**.

Mr. Leech knows **<ATTORNEY ONE>** or **<ATTORNEY TWO>** as a result of representing a client in a case in which they were **<ATTORNEYS FOR ADVERSE CLIENTS>** or **<ATTORNEYS FOR THE SAME CLIENT>** or **<ATTORNEYS REPRESENTING COOPERATING PARTIES>** in **<YEARS>**.

Dated: **<MONTH> <DATE>, <YEAR>**.

Michael J. Leech

Mediator: Michael J. Leech