**Mediation Plan for …….**

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| **1. MEDIATION STRATEGY: GOALS, OBJECTIVES AND LIKELIHOOD OF RESOLUTION** |

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| **2. DIVISION OF RESPONSIBILITIES AND TACTICS** |

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| **3. OUR UNDERLYING INTERESTS** |

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| **4. OUR BATNA** |

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| **5. OTHER PARTY’S LIKELY UNDERLYING INTERESTS** |

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| **6. OTHER PARTY’S LIKELY BATNA** |