CADRS Negotiation Tool

# Party(ies) A Including counsel (If Any):

|  |  |  |  |
| --- | --- | --- | --- |
| Name | Title | Contact | Settlement Authority |
|  |  |  |  |
|  |  |  |  |

# Party(ies) B Including counsel (If Any):

|  |  |  |  |
| --- | --- | --- | --- |
| Name | Title | Contact | Settlement Authority |
|  |  |  |  |
|  |  |  |  |

# Interested Third Parties (If Any):

|  |  |  |
| --- | --- | --- |
| Party | Contact | Interest |
|  |  |  |

# Shipment/Cruise Information

## B/L Numbers and Container Numbers or Voyage Information:

## Shipment Status:

## Notes:

# Opening Demands/Positions

Notes:

|  |  |
| --- | --- |
| Party A | Party B |
|  |  |

# Previous Offers/Counter Offers for Settlement:

# Additional Comments re: History of Dealing/Relationship:

# Party A Interests:

## Commercial:

## Legal:

## Personal Reputational:

## Third party:

## Other:

# Party B Interests

## Commercial:

## Legal:

## Personal Reputational:

## Third party:

## Other:

# Notes:

# Party(ies) A Goals and Options:

## Party Goals for Settlement (e.g. receive goods, payment, avoid/minimize regulatory liability, etc.)

## Best Alternative to Negotiated/Mediated Settlement

|  |  |
| --- | --- |
| Party A | Party B |
|  |  |

## Worst Alternative to Negotiated/Mediated Settlement

|  |  |
| --- | --- |
| Party A | Party B |
|  |  |

# Resources for Potential Proposals

|  |  |  |
| --- | --- | --- |
| Immediate Resources | Obtainable | Need Third Party Approval/Participation |
|  |  |  |

# Potential Party Resource Linkage for Settlement

|  |  |
| --- | --- |
| Party A | Party B |
|  |  |

# Party Linkage Notes: (e.g. Need for 3rd Party Consultation/Approval?)

# Potential Settlement Proposals:

# Opening Proposals:

# Intermediate Range Including Creative Offers:

# Bottom Line:

# Objective Measures In Support of Proposals

[e.g. Industry Customs, Guidelines or Best Practices, FMC Regulations or Best Practices, Tariff/Contract Terms, Fair Market Value, Ticket Contract, Cruise Passenger Bill of Rights, Equal Treatment, Third Party Audit (e.g. Volume Disputes)].