

Form 9J*

Confidential and Without Prejudice

IN THE STATE COURTS OF THE REPUBLIC OF SINGAPORE

[CASE NUMBER]

OPENING STATEMENT FOR PLAINTIFF/DEFENDANT (MEDIATION)

1. Parties attending the mediation session

- (a) Plaintiff/Defendant/other party to suit
- (b) [Name of any other party attending; reason for attending]
- (c)

Where party is a corporate entity,

- (a) [Name and position of authorised representative of Plaintiff/Defendant]

2. Brief summary of facts

[Summarise your version of facts that gave rise to your claim/defence.]

3. Claim/Defence/Counterclaim/Defence to Counterclaim

[Summarise your legal claim or Defence.]

4. Evidence supporting claim

A. Essential documents

The following *essential* documents are currently being relied on to support our claim/defence (without prejudice to modification after discovery):

(a) [Provide very brief details on how document supports your case. Append a copy of document to opening statement.]

(b)

...

B. Essential witnesses

We currently intend to rely on the following *essential* witnesses if the case goes to court (without prejudice to modification after extracting order of court containing court's directions for exchange of affidavits of evidence-in-chief):

(a) [Provide very brief outline of what you believe each essential witness will say.]

(b)

...

5. Negotiation history

The parties have not engaged in any negotiations to settle the dispute OR

The parties have been engaging in discussions to attempt to settle the dispute privately. The parties have made the following offers on a "without prejudice" basis:

(a) [Provide details on the offer, and why it was not accepted.]

(b)

6. Other relevant information for settlement

[Provide any other information that may be beneficial in reaching a settlement.]

Dated this [-] day of [-] 20__

SOLICITORS FOR THE [PLAINTIFF/DEFENDANT]