

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

MEDIATION REQUESTED IN:	)	
	)	
[Corporation, Inc.]	)	Mediation No. _____
	)	
and	)	
	)	
[Party B]	)	

JOINT PETITION FOR MEDIATION

[Corporation, Inc. and Party B], by and through their undersigned counsel, hereby petition the Court pursuant to 10 *Del. C.* §§ 346 and 347 and Court of Chancery Rules 93 through 95, as follows:

1. IF LITIGATION IS PENDING: [Corp., Inc.] and [Party B] are parties to certain litigation currently pending as [give caption and Civil Action Nos.] in the [Court Name].
2. IF NO LITIGATION PENDING: [Briefly state nature of action, and/or include draft complaints or exhibits.]
3. [Corp., Inc. or Party B or both] is [are] a [specify type of business entity] organized and existing under the laws of the State of Delaware or having its principal place of business in Delaware.
4. [Corp., Inc. and Party B] hereby consent to mediation in an attempt to reach a resolution of the issues raised in their dispute. By this Petition, the parties jointly request that the mediation be conducted in the Court of Chancery of the State of Delaware, pursuant to 10 *Del. C.* §§ 346 and 347 and Court of Chancery Rules 93 through 95.

5. The disputes between the parties involve [provide brief description; for a patent dispute, for example, the description might be “involve patent technologies and include (a) the alleged infringement of U.S. patents and the damages therefore, (b) the validity of the patents-in-suit, and (c) certain equitable issues.”] No consumers are parties to this [dispute or action.] IN THE CASE OF A DISPUTE INVOLVING SOLELY A CLAIM FOR MONEY DAMAGES: The amount in controversy in the pending [dispute or action] is in excess of one million dollars (\$1,000,000).

WHEREFORE, [Corp., Inc. and Party B] hereby request that the Court enter an order scheduling a Mediation Conference in accordance with Court of Chancery Rules 93-95. A proposed form of order is attached to this Petition.

Dated:

[Attorney for Corp., Inc.]
[Attorney’s address]

[Attorney for Party B]
[Attorney’s address]