

Attorney Preparation For Neutral Case Evaluation

Case Number: _____

Case Name: _____

Date of NCE: _____ Evaluator: _____

- I have completed Rule 1.25a disclosures. The other side has all required information.
- I have negotiated with the other side and understand their perspective on issues (even if I do not agree with them).
- I have any partial agreements or stipulations we have reached and will share them with the Evaluator.
- I am clear about which issues are still in dispute, and which issues are settled.
 - Parenting time
 - Residence of the child(ren)
 - Decision-making with regard to the child(ren)
 - Child support
 - Alimony
 - Retirement and other accounts
 - Debts
 - Home
 - Other real property
 - Other issues of importance to my client
- I am clear about what is most important to my client, and what my client's opinion is on the issues that need to be decided.
- I have helped my client think through a variety of options for the issues in dispute.
- I have helped my client think through the issues about which the other person has concerns or cares.
- I have shared my perspective on what the client wants, include ways in which the client might not receive exactly what the client wants. I have walked my client through potential outcomes.
- I have developed proposed agreements based on my client's interests and will share them with the Evaluator.
- I have communicated with my client about the value of NCE for the client and the case, how NCE is structured, how it is different than trial or a hearing, what my role and theirs will be, and how the Evaluator may interact with them.
- I understand, and have prepared my client, that this might be the final event in the case. I have prepared my client, and I am prepared, to work toward and potentially reach agreement during NCE, if the agreement meets my client's interests well and the agreement is durable.