

APPENDIX XXII-B (R. 4:21A-4)
UNIFORM COMMERCIAL ARBITRATION MEMORANDUM
(All Information Must Be Legibly Printed Or Typed)

PLEASE RETURN TO:

Number of Witnesses you are offering at Arbitration: _____

Anticipated length of time for your presentation: _____

1. Brief factual outline as to your position:

2. Set forth disputed facts and issues by any party in outline form:

3. Provide facts that you anticipate will be undisputed:

4. Set forth legal issues to be addressed by arbitrator:

5. Please quantify elements of your alleged damages:

6. Set forth issues addressed in expert reports (attach copies):

7. Discuss mitigation of damages (if applicable):

8. Describe the basis for the defenses you assert to the complaint and/or counterclaim:

9. Have all parties been served: Yes _____ No _____

10. Are any parties in default? Yes _____ No _____

11. List any unserved and/or defaulted parties:

12. Should any special expertise be required by the arbitrator, e.g., should the arbitrator be familiar with a particular discipline and/or industry? If yes, please specify:

I certify this information to be complete and accurate and that copies of this statement have been timely served on all adversaries pursuant to R. 4:21A-4.

Signature of Attorney or *Pro Se* Litigant

Date: _____

(Please print or type name)

Attorney for: _____

NOTE: Information provided on this form can not be used for evidentiary purposes in any trial of this matter.