

UNITED STATES DISTRICT COURT
DISTRICT OF FLORIDA
DIVISION

PARTY A,

Plaintiff,

v.

Case No. **X:XX-cv-XXXXXX-XXX-XXX**

PARTY B,

Defendant.

_____ /

JOINT MOTION TO CONDUCT
MEDIATION OVER VIDEO CONFERENCE

Mediation in the above styled case has been scheduled before mediator Christopher Shulman for [Month and Day], 2020, beginning at [Time]. The mediation is currently set to take place at [Address of Mediation Conference Location], Florida. Expected to attend the mediation are Plaintiff, Defendant's [Corporate Representative], Defendant's insurance adjuster for the relevant liability insurance policy, and the undersigned counsel for the parties.

In the interests of mitigating the risks associated with COVID-19 issues, the parties now jointly request an Order from this Court allowing the mediation to take place over video conference. The parties have conferred with mediator Shulman and, if this motion were granted, they agree to use the online secure platform provided by Zoom.us to conduct the mediation over video conference.

Conducting the mediation over video conference will protect the parties from the risks of contagion posed by the COVID-19 pandemic, which have led to ordered or recommended limitations on travel and in-person meetings. While it is important for the parties and their attorneys to be present at the mediation in person, the parties will not be prejudiced by allowing

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the mediation to take place over video conference; indeed, particularly because the Zoom platform enables all participants to see and hear one another, proceeding this way should not have any significant impact on the outcome of the mediation conference.

As such, the parties respectfully request that they be allowed to conduct the mediation over video conference using the above-described Zoom platform.

Respectfully submitted this _____ day of _____, 2020.

[Signature Blocks for both counsel]