

**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.**