

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
at \_\_\_\_\_**

IN RE:	*	
	*	Case No. _____
Debtor(s)	*	Chapter _____
-----*		
	*	Adversary No. _____
Plaintiff(s)/Movant(s)	*	INITIAL MEDIATION
vs.	*	CONFIDENTIALITY AGREEMENT
Defendant(s)/Respondent(s)	*	<u>CONFIDENTIAL - NOT TO BE FILED</u>
	*	<u>WITH THE COURT</u>
*   *   *	*	*   *   *

This is an Agreement between the parties and the Mediator to enter into confidential discussions about the mediation of the following issues: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[Attach additional page(s) if necessary.]

The undersigned understand and agree to the strict confidentiality of their mediation. Mediation discussions, any draft resolutions and any unsigned mediated agreements must not be disclosed to anyone not involved in the Mediation Program and will not be admissible in any court or administrative proceeding. Only an agreement signed by all parties may be so admissible.

The parties further agree not to call the Mediator to testify concerning the mediation nor to provide any materials from the Mediation Program in any court or administrative proceeding between the parties.

In addition, the Mediator will not be compelled to divulge any materials from the Mediation Program or to testify in regard to the mediation in any judicial or other proceeding.

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Name of Party)

\_\_\_\_\_  
(Signature of Party)

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Name of Party's Counsel)

\_\_\_\_\_  
(Signature of Party's Counsel)

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Name of Party)

\_\_\_\_\_  
(Signature of Party)

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Name of Party's Counsel)

\_\_\_\_\_  
(Signature of Party's Counsel)

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Name of Mediator)

\_\_\_\_\_  
(Signature of Mediator)

[Attach additional page(s) if necessary.]