

October 29, 2019

To: All Volunteer Clients – Bio-Con or Microtex CEOs  
Fr: Marjorie Aaron, Professor of Practice  
Re: Bio-Con v. Microtex Settlement Negotiation

First, thank you for agreeing to take on a CEO client role in the Bio-Con v. Microtex settlement negotiation. As indicated in my earlier emails, you will be represented by (law student) attorneys in the effort to negotiate a settlement of Bio-Con's and Microtex's legal dispute involving claims of fraud and breach of contract arising out efforts to form a joint venture. Your assigned role is reflected in the attached pairing's sheet, as is your attorney's name and contact information.

Your first meetings with your attorney should take place sometime during the first week of November (Nov.4-10), at any mutually convenient time and place. The purpose of this initial meeting is for lawyers and clients to prepare together for the full "four-way" settlement negotiation. This generally takes about an hour and a half or so (and not less than an hour). The final "four-way" negotiation sessions with the lawyers and clients on the both sides should take place after that lawyer-client meeting and before Monday, November 18.). You are free to negotiate whenever it works for your group. The average full negotiation session usually takes two and a half to three hours; please do allow for that much time when you schedule it.

I have already given all of your student lawyers your contact information and they should be in touch shortly to set up their initial meeting with you as well as a time for the full negotiation. Past experience strongly suggests nailing down those dates as soon as possible. Of course, you are also free to initiate contact with your lawyer, especially if your early November calendar is becoming full.

I ask that you read the attached information - your role and all of the back-up information and documents *prior to* meeting with your student lawyer. (Unless you know your client role, it won't really be possible for you and your lawyer to prepare for the full negotiation.) It's also important that you "stay in role" at that initial meeting – really "be" the client.

Your lawyer should be able to answer any questions you have about the legal issues, so don't worry if the legal aspects of the information are confusing or unclear. That's what your lawyers are for! They should also be prepared to discuss the upcoming negotiation with you. Whether or not to settle your case in that negotiation is YOUR decision – clients are the ones with settlement authority. However, your lawyer should be ready to advise you.

THANK YOU again for your willingness to participate as "real clients"; I very much hope you find it to be an interesting and worthwhile experience.

Please feel free to contact me if you have any questions or concerns.

With much appreciation,

***Marjorie Corman Aaron***  
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