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## **WRITTEN AND FLAT FEE HEARING OPTIONS**

### **Neutrals:**

**Patrick Duffy** maintains a sole litigation practice in Sumner with a focus on complex personal injury and selected employment-based claims, in addition to his service as a mediator and UIM arbitrator.

**Judit Gebhardt** has served as a settlement judge, arbitrator and mediator since 1988. Her Olympia-based practice emphasizes property damage, consumer and contract claims resolution.

**Margo Keller** was a partner in the Lasher Holzapfel firm in Seattle with a practice oriented to commercial, civil, estate and property claims resolution before becoming a full-time mediator and commercial arbitrator.

**Cindy Morgan** was a member of the Messina Bulzomi plaintiffs firm in Tacoma and Scheer & Zehnder defense firm in Seattle before becoming an Administrative Law Judge. Her emphasis is on personal injury and insurance claims.

### **Arbitration:**

**Case Submission Guidelines.** WAMS Written or Flat Fee Option is suitable for two-party cases in which there is a dispute involving less than \$50K in value and an underlying contractual relationship or need for an umpire or appraisal by statute or policy provision. The arbitrator and hearing or due date must be agreed by the parties or designated by WAMS at case submission. Hearing fees must be prepaid at the time of scheduling.

**Written Submission Guidelines and Cost.** Written submission only hearings do not involve an in-person hearing and have limits on submissions to no more than 15 pages per party, inclusive of exhibits and records. The cost is \$475.00 per party, with submissions in excess of these limits resulting in a supplemental fee obligation for the appropriate parties and/or their attorneys. Decision format determined by the arbitrator.

**Flat Fee Hearing Guidelines and Cost.** Guidelines for *two-hour*, in-person arbitration hearings are as follows:

- a. Hearing must be conducted at WAMS or the neutral's office to minimize travel time;
- b. Each side is given 45 minutes for case presentation plus 15 minutes for opening and closing;
- c. Submissions are limited to 10 pages per party, submitted electronically and inclusive of attachments;
- d. Form decision issued; no requests for modification/reconsideration/clarification accepted;
- e. Cost of a Flat Fee hearing is \$575.00 per party for a two-hour hearing. Excess time billed at the arbitrator's normal hourly rate (\$350-\$450 depending on the arbitrator).

### **Mediation:**

**Flat Fee MAR/Telephonic Mediation Guidelines and Cost.** Guidelines for *two-hour*, in-person or telephonic mediation proceedings are as follows (hearing fees must be prepaid at the time of scheduling):

- a. Mediation must be conducted telephonically or at the mediator's office to minimize travel time;
- b. Submissions are limited to 10 pages per party, submitted electronically and inclusive of attachments;
- c. The cost of a Flat Fee MAR/Telephonic Mediation is \$475.00 per party. Excess time billed at the mediator's normal hourly rate (\$350-\$450 depending on the mediator);

**Applicable Rules and Procedures.** The applicable WAMS fee schedule, procedural rules and (10) Business Day Cancellation Policy will be in effect. Excess submissions or hearing time beyond what is scheduled will incur additional charges at the neutral's normal hourly rate. The WAMS cancellation policy does not apply to hearings by written submission only.