

MODEL MEDIATION CLAUSE

In order to ensure the mediation agreement clearly expresses the will of the parties regarding the selection of dispute settlement through mediation at the HTA Commercial Arbitration Center as well as regarding the pre-determination of some basic elements of mediation proceedings, the Center recommends that contract parties use one of the following model mediation clauses:

Model clause 1:

“Article ...: Settlement of disputes by mediation

All disputes arising out of or in connection with this contract shall be resolved through mediation at the HTA Commercial Arbitration Center, in accordance with its Mediation Rules.”

Model clause 2:

“Article ...: Settlement of disputes by mediation

1. All disputes arising out of or in connection with this contract shall be resolved through mediation at the HTA Commercial Arbitration Center, in accordance with its Mediation Rules.
2. The parties will jointly select a Mediator from the Center's Mediator List.”

Model clause 3:

“Article ...: Settlement of disputes by mediation

1. All disputes arising out of or in connection with this contract shall be resolved through mediation at the HTA Commercial Arbitration Center, in accordance with its Mediation Rules.
2. The parties will jointly select a Mediator from the Center's Mediator List.
3. This mediation agreement does not exclude the right of each party to sue to the Court.”