

In the United States Court of Federal Claims

NO. XX-XXX

XXXXXXXXXXXXXX,

Plaintiff,

v.

THE UNITED STATES,

Defendant.

ADR CONFIDENTIALITY AGREEMENT

The parties */ agree that all ADR proceedings, including statements made and documents prepared by any party, attorney, or other participant, are privileged and shall not be disclosed in any subsequent proceeding or document or construed for any purpose as an admission against interest. However, information and documents not specifically prepared for or revealed in confidence in ADR, and otherwise discoverable and/or admissible, are discoverable and admissible as determined by the trial judge. The parties further agree not to subpoena or seek in any way the oral or written testimony of the ADR judge for any purpose in this or any other proceeding, or to subpoena or seek in any way any materials submitted to the ADR judge during the ADR process for use in this or any other proceeding.

*/ All parties, along with their attorneys, who participate in the ADR proceedings shall sign this agreement.

No party shall be bound by anything said or done during ADR proceedings unless a settlement is embodied in a written agreement signed by all parties.

Plaintiff

Defendant

Plaintiff's Attorney

Defendant's Attorney

Party

Party's Attorney

Date