**Circuit Court of Cook County**

)

)

Plaintiff )

)

v. ) No.: 2025-L-123456 )

)

)

)

)

Defendants. )

**PLAINTIFF’S CONFIDENTIAL MEDIATION MEMORANDUM**

1. **INTRODUCTION**

{{Introduction}}

1. **PARTIES**

**John Doe**

John Doe is a long-haul truck driver who sustained permanent injuries...

**{{Plaintiff\_3\_Name}}**

{{Plaintiff\_3\_Statement}}

**STL Trucking Co.**

STL Trucking employed the driver at fault and failed to train him properly...

**{{Defendant\_2\_Name}}**

{{Defendant\_2\_Statement}}

**{{Defendant\_3\_Name}}**

{{Defendant\_3\_Statement}}

**{{Defendant\_4\_Name}}**

{{Defendant\_4\_Statement}}

**{{Defendant\_5\_Name}}**

{{Defendant\_5\_Statement}}

**{{Defendant\_6\_Name}}**

{{Defendant\_6\_Statement}}

**{{Defendant\_7\_Name}}**

{{Defendant\_7\_Statement}}

1. **DEMAND**

$1,000,000 policy demand due to life-altering injuries.

1. **FACTS/LIABILITY**

On April 1, 2022, the defendant rear-ended the plaintiff on I-70.

1. **CAUSATION, INJURIES AND TREATMENT**

Plaintiff required surgery and 18 months of physical therapy.

1. **ADDITIONAL HARMS AND LOSSES**

Plaintiff can no longer drive professionally.

1. **FUTURE MEDICAL BILLS RELATED TO THE COLLISION**

Expected costs exceed $200,000.

1. **CONCLUSION**

We are prepared to proceed to trial if resolution is not reached.

Sincerely,

|  |
| --- |
| /s/ *Michael R. Grieco* |

Michael R. Grieco

**STINAR GOULD GRIECO & HENSLEY**

101 N Wacker Drive, Suite 100

Chicago, IL 60606

Tel: (312) 728-7444

Fax: (313) 221-9550

Email: [Mike@SGGHLaw.com](mailto:Mike@SGGHLaw.com)