

Mediation Fees

Mediation fees are charged on a per-party basis. Each separately represented party or side is responsible for the applicable fee.

Tier	Half Day	Full Day
Tier 1 — Standard Matters	\$575 per party	\$1,050 per party
Tier 2 — Intermediate Matters	\$650 per party	\$1,200 per party
Tier 3 — Complex Matters	Not available	\$1,400 per party

A half-day mediation is ordinarily scheduled for up to four hours. A full-day mediation is ordinarily scheduled for up to eight hours.

The tiers principally reflect the anticipated time, preparation, complexity, and demands of the mediation. Monetary amounts are secondary guidelines and do not determine classification by themselves.

The case types within tiers are merely illustrative and do not represent the only case I mediate.

Tier 1 — Standard Matters

Tier 1 generally applies to:

Family Law Matters

- Divorce cases without minor children when the gross value of the marital estate is less than \$1 million, unless the matter presents unusual financial, property, valuation, or other complexity.

Civil, Probate, and Property Matters

- Debtor-creditor disputes.
- Contract disputes.
- Easement disputes.
- Small-estate and probate matters.
- General civil disputes.

Tier 1 ordinarily applies when the amount genuinely in dispute does not exceed \$200,000, exclusive of attorney's fees, interest, and court costs; and the matter does not otherwise present intermediate or complex demands.

Tier 2 — Intermediate Matters

Tier 2 generally applies to:

Family Law Matters

- Cases involving significant conservatorship, possession, child-support, or other issues concerning minor children.
- Cases involving a gross marital estate of up to \$3 million.
- Cases presenting moderately complex property, conservatorship, possession, support, reimbursement, or financial issues.

Civil, Probate, Business, and Property Matters

- Contract disputes involving up to \$2 million.
- Estate and probate disputes involving up to \$2 million or contested capacity, fiduciary conduct, multiple beneficiaries, family history or difficult emotions.

- Business disputes of moderate complexity.
- Land partitions involving two separately represented parties or sides and property valued at no more than \$3 million will ordinarily be classified as Tier 2, unless title, valuation, improvement, contribution, access, mineral, survey, or division issues warrant Tier 3 treatment.

Tier 3 — Complex Matters

Tier 3 matters are scheduled only as full-day mediations. Tier 3 generally applies to:

Family Law Matters

- Cases involving a gross marital estate exceeding \$3 million.
- Cases involving complex property characterization, tracing, reimbursement, business valuation, fiduciary issues, tax issues, or substantial financial documentation.

Probate, Fiduciary, Business, and Property Matters

- Substantial or complex fiduciary claims, including matters involving contested accountings, multiple beneficiaries, disputed transactions, removal or surcharge requests, or extensive financial records.
- Estate, probate, or estate-division disputes involving more than \$2 million and/or contested capacity, fiduciary conduct, multiple beneficiaries, family history or difficult emotions
- Land partitions involving more than two separately represented parties or sides, property valued at more than \$3 million, or substantial title, valuation, improvement, contribution, access, mineral, survey, or physical-division issues.
- Complex business, commercial, construction, insurance, or real-estate disputes.
- Multiparty or document-intensive cases.
- Other matters presenting unusual factual, legal, financial, procedural complexity or otherwise presenting complex demands.

Classification of Cases

The monetary amounts and case descriptions above are general guidelines. The appropriate tier depends primarily on the anticipated time, preparation, complexity, and demands of the mediation, including:

- The number of separately represented parties or sides.
- The factual and legal complexity of the dispute.
- The number and nature of the claims and defenses.
- The extent of disputed financial, business, title, tax, or valuation issues.
- The volume and complexity of documents to be reviewed.
- The anticipated preparation required.
- The number of participants and private-session groups.
- Unusual scheduling, travel, or administrative requirements.
- Any other circumstance reasonably affecting the time or work required for the mediation.

The tiers presented above are merely an attempt to classify the pertinent factor across typical case types.

The mediator may assign a matter to a different tier when its actual complexity or anticipated demands are not accurately reflected by the monetary thresholds alone.

The mediator may require a full-day setting when the anticipated complexity, number of participants, volume of issues, or other circumstances make a half-day setting impractical.

Per-Party Fees and Multiparty Matters

Each separately represented party or side ordinarily pays the applicable fee. Fees are billed to the attorney who may forward the invoice to the party to pay it directly.

Persons or entities represented jointly by the same counsel and participating as a single aligned interest may be treated as one side. Parties with separate counsel, separate interests, or separate private-session requirements will ordinarily be treated as separate parties or sides.

Because multiparty matters vary substantially, the mediator may establish a case-specific fee after considering the number of distinct interests, anticipated private sessions, preparation, and administrative demands.

Exceptionally complex or multiparty matters may be assigned to Tier 3 or quoted separately after consultation with counsel.

Additional Preparation

The scheduled mediation fee includes the ordinary preparation and document review reasonably associated with the applicable tier.

If a matter requires substantial additional preparation, unusually extensive document review, review of voluminous financial or business records, or other work beyond that ordinarily included in the scheduled fee, the mediator may charge an additional preparation fee.

Any additional preparation charge will be imposed only after reasonable notice to counsel and the parties.

Additional Mediation Time

If the parties agree to continue beyond the scheduled session, additional time will be charged at \$400 per hour, divided equally among the parties unless the parties agree otherwise or the mediator states a different allocation before the additional time begins.

Amount in Dispute

Unless otherwise stated, the amount in dispute means the amount genuinely at issue between the parties, exclusive of attorney's fees, interest, and court costs.

In family-law matters, the value of the marital estate generally refers to the gross value of the assets subject to division, without deduction for secured debt, unless the mediator determines that another measure more accurately reflects the complexity of the case.

Payment Responsibility

Unless the parties agree otherwise or a court order provides otherwise, each party is responsible for payment of that party's mediation fee.

(revised as of August 1, 2026)