

UNITED STATES, COMMONWEALTH OF MASSACHUSETTS,  
AND CONNECTICUT V. GENERAL ELECTRIC COMPANY (D. MASS.)  
CONSENT-DECREE  
APPENDIX S

CONFIDENTIALITY AGREEMENT FOR MEDIATION  
OF \_\_\_\_\_ MATTER

In order to promote frank and productive discussion, the mediation process will be confidential. The parties, their representatives, and the mediator(s) may not disclose information regarding the negotiations, including settlement terms, proposals, offers, or other written or oral statements made during the negotiations, to third parties, unless all parties otherwise agree. The negotiations shall be treated as compromise negotiations under Rule 408 of the Federal Rules of Evidence and applicable state rules of evidence. The mediator(s) shall not appear as a witness, either by subpoena of a party to the mediation or voluntarily, or participate as a consultant or expert, in any pending or future judicial or administrative action or proceeding relating to any matters discussed in these negotiations.

AGREED

Parties:

_____	Date: _____

Mediator(s)

_____	Date: _____
_____	Date: _____