



# 2025 FALL CONFERENCE

**NOVEMBER 13-14**

**MARRIOTT MARQUIS  
NEW YORK CITY**

# NEW IDEAS FOR THE ARBITRATION PROCESS

## **Ground Rules and Pre-set Neutral Panels**

# PANEL

**Larry Greengrass**

**Susan Grondine-Dauwer**

**Debra Hall**

**Connie O'Mara**

# MODERATOR

**Teresa Snider,  
Partner  
Porter Wright  
Morris & Arthur**

**GROUND  
RULES**



**OPTION FOR  
ALL PANELS**



**APPLY TO PRE-SET  
NEUTRAL PANELS**

**[neutralarbitrations.com](https://neutralarbitrations.com)**

- **Reduces bias in the adjudication of disputes**
- **Creates objective criteria for arbitrator appointments**
- **Promotes transparency and fairness**

# GROUND RULES

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Practices

**The parties agree that under the following circumstances, a panel candidate (“Candidate”) shall not serve if:**

- 1. Currently serving as either an expert witness or party-appointed arbitrator for either party (including affiliates), or for either counsel.**
- 2. Currently represents or has represented either party (including affiliates) as counsel within the last five (5) years.**
- 3. Has been an officer or employee of either party (including affiliates), or affiliated with either counsel, within the last five (5) years.**
- 4. Has been a party-appointed arbitrator or expert witness (or combination thereof) for, or on behalf of, either party (including affiliates) or counsel on three (3) or more occasions within the last five (5) years. Arbitrations that did not proceed after the Organizational Meeting shall not be counted. Arbitrations involving all-neutral panels shall also not be counted.**
- 5. Has been the umpire in cases involving either party (including affiliates) or counsel on six (6) or more occasions within the last five (5) years. Arbitrations that did not proceed after the Organizational Meeting shall not be counted. Arbitrations involving all-neutral panels shall also not be counted.**
- 6. They are unwilling to abide by the ARIAS-US Code of Conduct or these Ground Rules. In the event of any conflict between these Ground Rules and the ARIAS-US Code of Conduct, these Ground Rules shall apply.**
- 7. Once selected, the umpire/arbitrators shall agree not to accept appointments as an expert witness or party-appointed arbitrator for or against either party, its affiliates, or the parties’ counsel prior to the disposition of the matter for which the panel was selected.**

**Currently serving as either an expert witness or party-appointed arbitrator for either party (including affiliates), or for either counsel.**

**Currently represents or has represented either party (including affiliates) as counsel within the last five (5) years.**

**Has been an officer or employee of either party (including affiliates), or affiliated with either counsel, within the last five (5) years.**

# **Panel Candidate Shall Not Serve If...**

**Has been a party-appointed arbitrator or expert witness (or combination thereof) for, or on behalf of, either party (including affiliates) or counsel on three (3) or more occasions within the last five (5) years.**

**Has been the umpire in cases involving either party (including affiliates) or counsel on six (6) or more occasions within the last five (5) years.**

**Arbitrations that did not proceed after the Organizational Meeting shall not be counted. Arbitrations involving all-neutral panels shall also not be counted.**

# **Panel Candidate Shall Not Serve If...**

**Unwilling to abide by the ARIAS-US Code of Conduct or these Ground Rules. Once selected, the Candidate shall agree not to accept appointments as an expert witness or party-appointed arbitrator for or against either party, its affiliates, or the parties' counsel prior to the disposition of the matter for which the Pre-set Neutral Panel was selected.**

***The Ground Rules shall apply to the extent there are differences with the ARIAS Code of Conduct.***

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**Panel  
Candidate  
Shall Not  
Serve If...**

- **Avoid random selection**
- **Provide immediate efficiency/timeline**
- **Ensure experienced panel members**
- **Avoid weeks/months of delay over panel/umpire selection, eliminate risk in umpire selection, and eliminate arbitrator bias**

# **PRE-SET NEUTRAL PANELS**

Fostering Best  
Practices

**Pre-set Neutral Panels are comprised of qualified/certified arbitrators who are experienced in insurance/reinsurance business and the dispute resolution process.**

**Upon agreement, the parties jointly contact each member of the Pre-set Neutral Panel, identifying the parties / affiliates and counsel, as well as a brief description of the subject matter of the arbitration. The Pre-set Neutral Panel shall promptly advise the parties and counsel whether they are able to serve based on the Ground Rules.**

## **Panel and Party Commitments**

**Parties can mutually agree to select from the list of three-person panels provided on [www.neutralarbitration.com](http://www.neutralarbitration.com)**

**Arbitrators commit to the highest standards of ethical conduct. If a panel member is unable to serve based on the Ground Rules, the entire Pre-set Neutral Panel is disqualified for that arbitration.**

## **Panel and Party Commitments**

**Parties can mutually agree to select from the list of established panels provided on [www.neutralarbitrations.com](http://www.neutralarbitrations.com)**

**Virtual organizational meeting within forty-five (45) days of appointment or within sixty (60) days of appointment if the parties require an in-person organizational meeting.**

**Reasoned decision within thirty (30) days of the close of the case, unless otherwise required by both parties. The Pre-set Neutral Panel will remain constituted post ruling for administrative and other issues necessary to the completion of the arbitration.**

**Pre-set Neutral Panel agree to comply with the ARIAS-US Code of Conduct and enter into a standard confidentiality agreement, including mandatory document return / destruction requests.**

**Panels are  
Fast, Efficient  
and Thorough**

**Parties sign a formal retention agreement for the Pre-set Neutral Panel**

**Parties provide a standard hold harmless agreement for all members of the Pre-set Neutral Panel**

**Parties pay any retainer payments upon execution of the retention agreement**

**Parties agree to share all fees and expenses of the Pre-set Neutral Panel equally between the parties**

**Parties agree to standard form confidentiality agreement**

# Party Administration

# Let's Discuss



Are you willing  
to use the  
Ground Rules?



Are you willing to  
use Pre-Set  
Neutral Panels?

Thank You

Please reach out to any of the Panelists today to discuss further, request more information or please visit [neutralarbitrations.com](http://neutralarbitrations.com)

