

**From:** [Mark Esposito](#)  
**To:** [Comments Mailbox](#)  
**Subject:** [External]Proposed Rule Change for Civil Arbitrations  
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Two whom it may concern-

Please allow me to briefly comment upon the proposed rule change to mandate the submission of arbitration statements prior to arbitration hearings.

First, I agree, there should be no difference for submissions for in person vs virtual hearings. However the problem is that for "in person" hearings, arbitration panels are not identified until the parties arrive in court. As such, this may be hard to enforce, other than to allow for submissions via e-courts.

As to the proposed 5 day requirement, I would assert that 3 days is sufficient, especially if a page limit is imposed. As one whom often sits as an arbitrator, getting 200 page submissions for a 30-45 minute hearing is not practical. I advocate for a 50 page maximum submission, so as to be practical with arbitrators focus. 3 days in advance is enough for me, I often ask for submissions 24 hours in advance.

Respectfully,

Mark G. Esposito