Traditionally, arbitrators have been granted an immunity similar to the absolute judicial immunity given to judges in the decisionmaking process; they have not been held personally liable for acts and conduct associated with arbitration proceedings.\(^2\) In contrast, the second district appellate court in Baar v. Tigerman denied such arbitral immunity to an arbitrator who failed to make a timely award, and permitted a cause of action in breach of contract directly against him.\(^3\)

II. Arbitral Immunity

There has been little, if any controversy concerning the concept of arbitral immunity until now. According to one author:

B. Judicial Immunity Applied to Arbitrators: State Case Law

In the United States the concept of judicial or quasi-judicial immunity has also been extended to arbitrators. Jones v. Brown\(^61\) is generally credited for the first approval of the doctrine.