

MEDIATION SETTLEMENT AGREEMENT

This case was mediated on _____, 2001. The parties agree as follows:

- 1. Defendant(s) shall pay to the Plaintiff(s) the sum of \$_____ in full and final settlement of all claims arising out of the incident [that is the subject of the above styled case][incident that occurred on _____.]
- 2. Defendant(s) shall prepare a Complete Release to be forwarded to Plaintiff(s). Plaintiff(s) shall timely execute the Complete Release and shall file a Notice of Dismissal with Prejudice.
- 3. The parties shall bear their own litigation costs and expenses.
- 4. Plaintiff(s) shall satisfy all outstanding liens and subrogated interests and shall hold the Defendant(s) harmless from same.
- 5. [Defendant(s) agree to pay the settlement monies to Plaintiff(s) within 20 days of the Settlement Agreement.]
- 6. [Parties agree to keep confidential all terms and conditions of the settlement.]
- 7. _____
- 8. _____

Plaintiff

Defendant

Attorney for Plaintiff(s)

Attorney for Defendant