MEDIATION SETTLEMENT AGREEMENT

The undersigned parties, on this _____ day of ______________, 200_, have agreed to
the following settlement or their dispute concerning __________________________
____________________________________________________________________

and hereby memorialize such agreement according to the following terms:
____________________________________________________________________

The Settlement Agreement is binding on the parties and is admissible in court for
enforcement purposes.

In order to facilitate the above-specified terms of settlement, the parties further agree that
on or before the _____ day of ___________, 200_, they will execute a Complete
Release and a Stipulation of Dismissal. Defendant will then transfer settlement proceeds
to Plaintiff(s) and his/her attorney.

_________________________  ____________________________
Plaintiff                  Defendant

__________________________  ____________________________
Attorney for Plaintiff(s)  Attorney for Defendant