

MEMORANDUM OF UNDERSTANDING

CASE NAME:

On this _____ day of _____, 2010, the undersigned parties attended a mediation before Charles Campo, and having agreed to settle the above matter, hereby memorialize their agreement as follows:

TERMS:

1. Defendant(s) shall pay to _____

the total sum of \$ _____

as payment in full of all claims arising out of the events alleged in the complaint.

Payment shall be made as follows:

_____ shall pay the sum of _____ to _____

_____ shall pay the sum of _____ to _____

_____ shall pay the sum of _____ to _____

Defendant(s) shall use their best efforts to finalize payment on or before _____.

2. Plaintiff(s) agree to accept said sum with the knowledge that Plaintiff(s) will be barred from proceeding against the Defendant(s) in the future concerning this matter.
3. This settlement does not constitute an admission of liability by any of the parties.
4. Plaintiff(s) shall execute a stipulation of dismissal with prejudice and without costs to be filed upon receipt of the settlement funds.
5. Plaintiff shall execute a full release, releasing the Defendant(s) of all known and unknown claims arising out of the events alleged in the complaint.

6. Cross complaints shall be dismissed with prejudice.
7. Each party shall bear its own costs and attorney's fees.
8. This agreement shall be deemed drafted by all parties with the advice of counsel.

PARTIES:

**ATTORNEY/ AUTHORIZED
REPRESENTATIVE:**

_____ By _____

_____ By _____

_____ By _____

_____ By _____