

SETTLEMENT AGREEMENT

Re: Mediation of: ABC v. XYZ

Date: _____

The mediation of the above-referenced matter having concluded by settlement, the undersigned parties hereby evidence that agreement to settle the referenced action on the following terms:

- 1) _____ will pay to _____
the total sum of \$_____.
- 2) All parties will execute a mutual general release of all claims, including waivers of Civil Code § 1542.
- 3) Plaintiff will file a Request for Dismissal with Prejudice.
- 4) Each party is to bear its own costs and attorneys' fees.
- 5) The court may enter Judgment pursuant to the terms of this agreement under California Code of Civil Procedure § 664.6.
- 6) The parties intend that this document be binding, enforceable, and admissible pursuant to Evidence Code § 1123. This agreement shall be binding and final whether or not a further formal agreement is executed.
- 7) In the event one of the parties is required to enforce the terms of this agreement the prevailing party shall be entitled to reasonable attorneys' fees and costs.
- 8) Additional terms:

Plaintiff ABC

Date _____

Defendant ZYZ

Date _____

APPROVED AS TO FORM:

John Doe, Esq.
Attorneys for Plaintiff ABC

Date _____

Jane Roe, Esq.
Attorneys for Defendant XYZ

Date _____