PLAINTIFF

VS

CIVIL ACTION NO.

DEFENDANT

JOINT MOTION FOR JUDGMENT OF DISMISSAL WITH PREJUDICE

COME NOW the parties, through their respective attorneys, and file this their joint notion for entry of judgment of dismissal, with prejudice, and in support the parties would show that a compromise settlement has been reached between the parties wherein those representing the Defendant have offered to pay Plaintiff and Plaintiff has agreed to accept a sum acceptable to Plaintiff to compromise, settle, discharge, and dismiss each and every claim and cause he/she has, had, or ever will have arising out of, or in any way connected with the matters, facts, and incidents mentioned and referred to in the complaint filed herein against Defendant, and, further, there remain no issues or controversies between the Defendant and the Plaintiff.

Respectfully submitted,

, ATTORNEY FOR DEFENDANT

, ATTORNEYS FOR DEFENDANT