

CAUSE NO. _____

	§	IN THE DISTRICT COURT
	§	
Plaintiff(s),	§	
	§	
v.	§	OF _____
	§	
	§	
Defendant(s).	§	_____ JUDICIAL DISTRICT
	§	
	§	

MEMORANDUM OF AGREEMENT

On _____, 20__, the parties in the above-referenced case reached an agreement after conducting a mediation of the case with Jennifer Lloyd, Mediator.

The terms of the agreement are as follows:

1. The above styled and numbered case shall be resolved as follows:

- [Material terms of settlement]

2. The parties agree to release, discharge, and forever hold the other harmless from any and all claims, demands, or suits, known or unknown, fixed or contingent, liquidated or unliquidated whether or not asserted in the above case, as of this date, arising from or related to the events and transactions which are the subject matter of this case [except for the following: _____].

This mutual release runs to the benefit of all attorneys, agents, employees, officers, directors, shareholders and partners of the parties [except for the following: _____].

3. Counsel for _____ shall deliver drafts of any further settlement documents to the other parties by _____. The parties agree to cooperate with each other in the drafting and execution of such additional documents as are reasonably requested or required to implement the terms and spirit of this agreement.

4. If one or more disputes arise with regard to the interpretation and/or performances of this agreement or any of its provisions, the parties agree to attempt to resolve same by phone conference with the mediator who facilitated this settlement.

5. Each signatory to this settlement has entered into same freely and without duress after having consulted with an attorney of his or her choice. Each hereto has been advised by the Mediator that the Mediator is not the attorney for any party and that each party should have this agreement reviewed by that party's attorney prior to executing same.

Signed this the ____ day of _____, 2 ____.

PLAINTIFF(S):

DEFENDANT(S):

ATTORNEYS FOR PLAINTIFF(S):

ATTORNEYS FOR DEFENDANT(S):
