

STIPULATION FOR SETTLEMENT

Case Name:
LASC Case No.:
Mediation Date:

IT IS HEREBY STIPULATED by and between the parties through the respective counsel or representative of each that the above-referenced case this matter is deemed settled pursuant to the following terms and conditions. **This document is binding on the parties** and is admissible in Court pursuant to California Evidence Code § 1123 and is exempt from the confidentiality provision of California Evidence Code § 1152 et seq. and is enforceable by motion of any party pursuant to California Code of Civil Procedure § 664.6. This document may be executed in subparts and copies may be used as if they were the original. The terms, conditions and content of this settlement agreement are the work product of the parties and their attorneys and not that of the mediator.

Plaintiff(s) _____

hereby accepts Defendant(s) _____

offer of _____ in full

settlement of all claims arising from the events described in the complaint.

Other considerations: _____

Plaintiff(s) agrees to accept said sum as payment in full of all (his/her/their) claims, known or unknown, arising from the events described in the complaint with the knowledge that (he/she/they) will be barred from proceeding against Defendant(s) in the future regardless of what might happen.

Each party shall bear its own costs and attorney fees.

Parties shall execute mutual releases of all claims.

The parties agree that they have reached a full and final settlement of all claims arising from the events described in the complaint. This agreement is binding and it contains the material terms of the agreement between the parties.

Plaintiff(s) shall execute an appropriate release containing the provisions of California Code of Civil Procedure § 1542.

Confidentiality terms will be made part of the written settlement agreement.

Defendant's payment of settlement proceeds to be accomplished within _____ days of receipt of the executed release.

Plaintiff is responsible for satisfying any medical bills or liens incurred as a result of this case/accident.

Written dismissal will be filed no later than 45 days after the signing of this settlement agreement.

This settlement does dispose of the entire case.

DATE: _____

Plaintiff

Attorney for Plaintiff

Defendant

Attorney for Defendant