

IN THE CIRCUIT COURT OF THE *****JUDICIAL CIRCUIT
IN AND FOR *****COUNTY
CIVIL DIVISION

***,

Plaintiff(s),

v.

Case No.:

***,

Defendants(s).

_____ /

MEDIATION STIPULATION AND SETTLEMENT AGREEMENT

Pursuant to the Mediation Conference held with Paul U. Chistolini, Esq., Mediator No. 28262R, on [DATE], the parties have stipulated to and agreed to abide by the following:

1. The Defendant(s) shall pay to the Plaintiff(s) the sum of \$ _____, in full settlement of the cause(s) of action constituting this litigation.
2. The Defendant(s) shall pay said sum through the offices of Plaintiff's counsel of record within _____ days from the date of this stipulation.
3. Additional terms, if any:

4. The Plaintiff(s) shall voluntarily dismiss this litigation with prejudice, and execute and deliver to the Defendant's counsel of record General Release(s) and/or Indemnification Agreement(s) holding the Defendant(s) and their insurance carrier, if applicable, harmless from any third party liens or claims, including but not limited to Medicare liens, for which the Plaintiff(s) is/are legally liable only. Plaintiff(s) shall be responsible for satisfying all liens that might apply to these settlement proceeds.

5. Each party shall pay their own costs and fees, unless agreed otherwise. Mediation fees shall be payable within ten (10) business days of the date of the mediation, unless otherwise agreed.

6. This settlement is contingent upon the clearing of funds and the receipt by the Defendant's counsel of record of the dismissals, releases and indemnifications contemplated in Paragraph 4 above.

THIS AGREEMENT SHALL BE FILED WHEN REQUIRED BY LAW OR WITH THE PARTIES' CONSENT. THIS STIPULATION BECOMES BINDING UPON THE PARTIES BY THEIR EXECUTION AND THAT OF THEIR COUNSEL. THIS STIPULATION, IF FILED, SHALL BE ENTERED AS A JUDGMENT OF THE COURT, OR THE COURT SHALL RETAIN JURISDICTION TO ENTER FINAL JUDGMENT OR ENTER AN ORDER DISMISSING THE CAUSE.

<hr/> , Plaintiff	<hr/> , Defendant
<hr/> , Counsel for Plaintiff	<hr/> , Counsel for Defendant
	<hr/> , Insurance Representative