

# MEMORANDUM OF UNDERSTANDING

**CASE NAME:**

\_\_\_\_\_

On this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, the undersigned parties attended a mediation before Charles Campo, and having agreed to settle the above matter, hereby memorialize their agreement as follows:

**TERMS:**

1. Defendant(s) shall pay to \_\_\_\_\_

\_\_\_\_\_

the total sum of \$ \_\_\_\_\_

as payment in full of all claims arising out of the events alleged in the complaint.

Payment shall be made as follows:

\_\_\_\_\_ shall pay the sum of \_\_\_\_\_ to \_\_\_\_\_

\_\_\_\_\_ shall pay the sum of \_\_\_\_\_ to \_\_\_\_\_

\_\_\_\_\_ shall pay the sum of \_\_\_\_\_ to \_\_\_\_\_

Defendant(s) shall use their best efforts to finalize payment on or before \_\_\_\_\_.

2. Plaintiff(s) agree to accept said sum with the knowledge that Plaintiff(s) will be barred from proceeding against the Defendant(s) in the future concerning this matter.
3. This settlement does not constitute an admission of liability by any of the parties.
4. Plaintiff(s) shall execute a stipulation of dismissal with prejudice and without costs to be filed upon receipt of the settlement funds.
5. Plaintiff shall execute a full release, releasing the Defendant(s) of all known and unknown claims arising out of the events alleged in the complaint.

6. Cross complaints shall be dismissed with prejudice.
7. Each party shall bear its own costs and attorney's fees.
8. This agreement shall be deemed drafted by all parties with the advice of counsel.

**PARTIES:**

**ATTORNEY/ AUTHORIZED  
REPRESENTATIVE:**

\_\_\_\_\_ By \_\_\_\_\_

\_\_\_\_\_ By \_\_\_\_\_

\_\_\_\_\_ By \_\_\_\_\_

\_\_\_\_\_ By \_\_\_\_\_