

SETTLEMENT TERM SHEET

CAPTION: _____

A. CONSIDERATION

PAYMENT TO: _____

PAYMENT FROM: _____

AMOUNT: _____ DUE DATE: _____

PAYMENT TERMS, IF ANY: _____

DOES PAYMENT INCLUDE ATTORNEYS' FEES? YES NO

THIRD PARTY LIENS TO BE PAID FROM SETTLEMENT, IF ANY: _____

ADDITIONAL CONSIDERATION, IF ANY: _____

B. ADMISSION OF LIABILITY AND SCOPE OF RELEASE(S)

ADMISSION OF LIABILITY? YES NO

GLOBAL RELEASE BY ALL PARTIES? YES NO

RELEASE LIMITATIONS, IF ANY: _____

C. CONFIDENTIALITY

ARE SETTLEMENT TERMS CONFIDENTIAL? YES NO

IF CONFIDENTIAL, WHAT CAN BE SAID PUBLICLY?

DISPUTE AMICABLY RESOLVED

NOTHING

OTHER _____

EXCEPTIONS TO CONFIDENTIALITY:

ATTORNEYS, TAX ADVISORS
IMMEDIATE FAMILY
AS OTHERWISE REQUIRED BY LAW
OTHER: _____

D. FORMAL AGREEMENT AND DISMISSAL

FORMAL AGREEMENT TO BE PREPARED BY: _____

AND SENT TO OTHER PARTIES ON OR BEFORE : _____

OTHER PARTIES TO RESPOND ON OR BEFORE: _____

FINAL AGREEMENT SIGNED ON OR BEFORE: _____

DISMISSAL FILED ON OR BEFORE: _____

E. ADDITIONAL TERMS

SPECIFY ANY MATERIAL SETTLEMENT TERMS NOT SET FORTH ABOVE:

F. EFFECTIVE DATE AND SETTLEMENT AUTHORITY

THIS AGREEMENT CONTAINS ALL MATERIAL TERMS AND IS BINDING IMMEDIATELY AND NOT CONTINGENT UPON EXECUTION OF A FORMAL SETTLEMENT AGREEMENT.

EACH PARTY REPRESENTATIVE AFFIRMS HE OR SHE HAS FULL AUTHORITY TO ENTER INTO THIS SETTLEMENT ON BEHALF OF THE PARTY.

AGREED TO THIS _____ DAY OF _____, 20_____.

PLAINTIFF

COUNSEL FOR PLAINTIFF

Signature

Signature

Print Name

Print Name

[signatures continued on following page]

PLAINTIFF

Signature

Print Name

PLAINTIFF

Signature

Print Name

DEFENDANT

Signature

Print Name

DEFENDANT

Signature

Print Name

COUNSEL FOR PLAINTIFF

Signature

Print Name

COUNSEL FOR PLAINTIFF

Signature

Print Name

COUNSEL FOR DEFENDANT

Signature

Print Name

COUNSEL FOR DEFENDANT

Signature

Print Name