

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

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DEFENDANT

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COUNSEL FOR PLAINTIFF

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