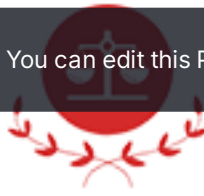




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## Mediation Settlement Agreement

This **Mediation Settlement Agreement** (the "**Agreement**") is prepared for mediation in the action indicated above (the "**Action**"), and has been signed by and between the parties of the action, \_\_\_\_\_ (the "**Plaintiff**") and \_\_\_\_\_ (the "**Defendant**").

**Court :**

**Case No :**

The undersigned parties agree to the terms and conditions of this Agreement, in full settlement of any and all claims which have been or could have been asserted in this action.

The parties irrevocably declare and undertake that they have resolved the dispute, which is the subject of the Action, before the mediator \_\_\_\_\_, therefore they have no receivables from each other within the scope of this dispute, and they do not have any material or moral compensation claims.

This Agreement only covers the resolution of the dispute which is subject to the Action. Disputes between the parties that have not yet arisen or that have arisen but have not been sued cannot be considered within the scope of this Agreement.

This Agreement has been signed by the parties to be submitted to the Court where the Action is heard. The parties know and accept that this Agreement will only bear legal consequences by being presented to the Court.

The parties represent and warrant that they have carefully reviewed this Mediation Settlement Agreement and they have consulted with their attorneys concerning this Agreement.



This Mediation Settlement Agreement constitutes the entire agreement and understanding between the parties and they have entered into this Agreement of their own free will and all prior and contemporaneous agreements, understandings, representations and statements, whether written or oral, are merged herein.

This agreement shall be governed by and construed in accordance with and only of the laws of the State of \_\_\_\_\_.

Each party shall bear its own attorneys' fees and all costs of this Action.

The parties hereto have executed and made this Agreement effective as of the date of \_\_\_\_\_.

**the Plaintiff**

**the Defendant**

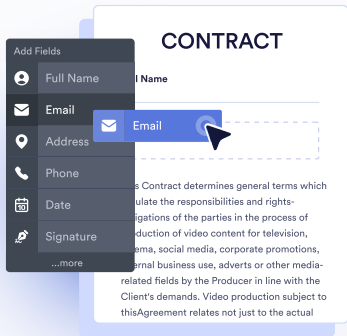


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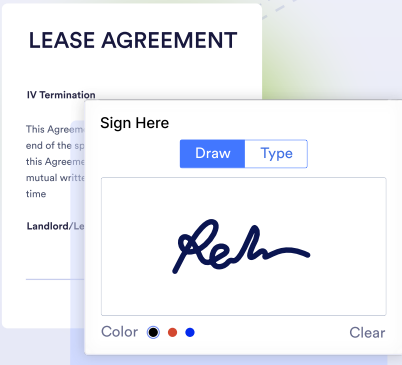
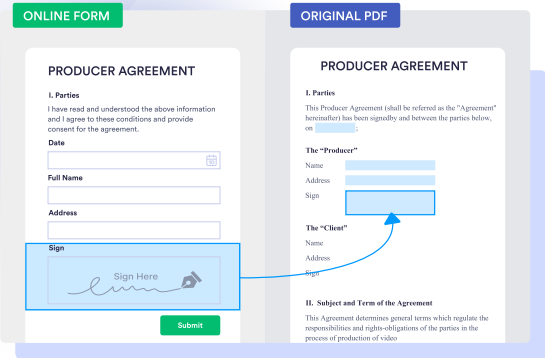
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