



**KARSTEN H. RASMUSSEN**  
SENIOR JUDGE AND MEDIATOR

**MEMORANDUM OF SETTLEMENT (PERSONAL INJURY)**

**Case Name:** \_\_\_\_\_  
\_\_\_\_\_

**Date of Mediation:** \_\_\_\_\_

The parties have reached a mediated settlement of all claims in the above referenced case. The parties intend the settlement to be binding and final. The purpose of this settlement memorandum is to provide a written summary of the essential terms of the settlement agreement made arising out of this Mediation. This is not the Settlement Agreement or Release of Claims. That document will be prepared by:

\_\_\_\_\_ (attorney) no later than: \_\_\_\_\_  
(date by which opposing counsel will receive a draft)

In the event that the parties are unable to agree to the form and content of the Settlement Agreement and Release of Claims, the parties shall submit their dispute to the Mediator, Senior Judge Karsten Rasmussen, who will issue a binding and decision based on his understanding of the terms of the settlement agreement.

The essential terms of the settlement agreement are as follows:

The insurer of the defendant(s) will pay \$ \_\_\_\_\_ to the plaintiff(s) in following manner (choose one):

The payment will be tendered within 5 days of receipt of the signed Release by the plaintiff;

The The payment will be tendered with the Release and only negotiated once the signed Release is received;

The payment will be tendered with the Release, and may be held in the attorney's trust account, but only disbursed after the signed Release is received.

Any PIP reimbursement claims will be handled by (chosed one):

Directly by the defendant's insurance company

By the plaintiff

The plaintiff will be responsible for paying and satisfying any other liens or reimbursements and holds defendant harmless against any claims that could be made against the defendant or defendant's insurer.

Other terms: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The terms of Settlement will be confidential (chosed one):

Yes Yes

No

Other: \_\_\_\_\_

Settlement Check will be Payable to: \_\_\_\_\_

Tax ID of payee: \_\_\_\_\_

The parties agree that any dispute arising out of the Memorandum of Settlement, Settlement Agreement, or Release of Claims will be resolved by the Mediator. The Mediator's decision on any such dispute will be binding and non-appealable. The Mediator holds the same immunity in this decision as any judge in a court of law.

\_\_\_\_\_  
Attorney for Plaintiff

\_\_\_\_\_  
Attorney for Defendant

\_\_\_\_\_  
Plaintiff

\_\_\_\_\_  
Defendant (if applicable)