

**MEDIATED SETTLEMENT AGREEMENT**

**A.** We are Plaintiff(s) \_\_\_\_\_  
\_\_\_\_\_ (“ ”) and Defendant(s) \_\_\_\_\_  
\_\_\_\_\_ (“ ”) in a Hennepin County District Court lawsuit, Court File No. \_\_\_\_\_  
 (“Lawsuit”).

**B.** We engaged in mediation to settle the claims and disputes between us and reached a settlement as follows:

1. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. We release each other and each other’s heirs and representatives from all claims brought or which could have been brought in the Lawsuit, except for enforcement of this Mediated Settlement Agreement.

4. We have signed this Mediated Settlement Agreement freely. No other promises were made to obtain this Mediated Settlement Agreement except the promises in it.

5. This Mediated Settlement Agreement is binding and enforceable.

6. The Agreement to Mediate is a part of this Mediated Settlement Agreement.

7. The Lawsuit shall be dismissed with prejudice on the merits, meaning that we cannot file the Lawsuit again or make the same claims in another lawsuit. No fees or costs will be awarded to any party.

8. We have been advised of the mediator's qualifications and the terms of Minn. Stat. § 572.35 attached.

Date: \_\_\_\_\_  
\_\_\_\_\_ **Mediator**

Parties:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### 572.35. Effect of mediated settlement agreement

Subdivision 1. General. The effect of a mediated settlement agreement shall be determined under principles of law applicable to contract. A mediated settlement agreement is not binding unless:

(1) it contains a provision stating that it is binding and a provision stating substantially that the parties were advised in writing that (a) the mediator has no duty to protect their interests or provide them with information about their legal rights; (b) signing a mediated settlement agreement may adversely affect their legal rights; and (c) they should consult an attorney before signing a mediated settlement agreement if they are uncertain of their rights; or

(2) the parties were otherwise advised of the conditions in clause (1).

Subd. 2. Debtor and creditor Mediated. In addition to the requirements of subdivision 1, a mediated settlement agreement between a debtor and creditor is not binding until 72 hours after it is signed by the debtor and creditor, during which time either party may withdraw consent to the binding character of the agreement.