IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

Plaintiff		:	
		:	
v		: Case No.	
		:	
Defendant		:	

AGREEMENT

The parties and attorneys whose signatures appear below agree that all proceedings at their mediation or mediated settlement conference and at any extension of such conference, including any statement made or document prepared by any party, attorney or other participant, are privileged and shall not be disclosed in any subsequent proceeding or document or construed for any purpose as an admission against interest. As used herein, the phrase "document prepared by any party, attorney or other participant" shall not be deemed to apply to any settlement agreement that may result from their mediated settlement conference; and this agreement shall not apply to any such settlement agreement. The parties agree not to subpoena the mediator or any documents prepared for mediation. In no event will a mediator voluntarily testify on behalf of a party.

No party shall be bound by anything said or done at the conference(s) unless and until a settlement agreement is reached and one of the following occurs: (1) such settlement agreement is reduced to a writing signed by all parties; or (2) the specific terms of such settlement agreement are entered into the record by an officer authorized by law to administer oaths (such as a court reporter) in the presence of and with the consent of all parties (or their authorized representatives); or (3) the specific terms of such settlement agreement are recorded by audio or video tape and each of the parties (or his/her authorized representative) audibly acknowledges on the audio or video tape that the terms are correct and that he/she consents to be bound by those terms.

Plaintiff	Defendant
Plaintiff's Attorney	Defendant's Attorney
Mediator	Date