

IN THE MATTER OF:

Court File No.: [INSERT No.]

ONTARIO  
SUPERIOR COURT OF JUSTICE

BETWEEN:

[INSERT PARTY NAME(S)]

Plaintiff(s)

and

[INSERT PARTY NAME(S)]

Defendant(s)

**Minutes of Settlement further to settlement at Mediation**

Without any admission of liability on behalf of the defendants, the parties to the action agree as follows:

1. The Defendants will pay to the Plaintiffs, the sum of [\$INSERT AMOUNT (CAD)] in full satisfaction of damages, costs, interests, taxes, HST, and any other issue, amounts, relevant to, and arising out of, the herein action (the "SETTLEMENT AMOUNT") within 20 days following the service of the order dismissing the action.
2. The SETTLEMENT AMOUNT will be broken down as follows:
  - a. To the Plaintiff, [PARTY]:
    - i. General damages: [INSERT \$AMOUNT]
    - ii. Income loss: [INSERT \$AMOUNT]
      - Past loss of Income: [INSERT \$AMOUNT]
      - Future income loss: [INSERT \$AMOUNT]
    - iii. Housekeeping: [INSERT \$AMOUNT]
    - iv. Future Care: [INSERT \$AMOUNT]
    - v. Special damages: [INSERT \$AMOUNT]
    - vi. Costs: [INSERT \$AMOUNT]
    - vii. Disbursements: [INSERT \$AMOUNT]
  - b. To the Plaintiff, [PARTY]:
    - i. Damages for loss of care guidance and companionship pursuant to the *Family Law Act*: [INSERT \$AMOUNT]
3. The SETTLEMENT AMOUNT will be directed to the Plaintiffs' solicitors, \_\_\_\_\_ *in trust*," such payment will be by way of wire/EFT transfer or another means, which will be agreed upon in writing by counsel for the parties.
4. The Defendants shall pay for the mediator's fees.
5. The parties agree to a without costs dismissal of the herein action on consent.

6. The Plaintiffs will sign a Full and Final Release, the terms of which are to be approved by counsel for the parties.
7. These Minutes of Settlement may be executed by the parties in separate counterparts each of which when so executed and delivered shall be an original, but all such counterparts shall together constitute one and the same instrument. Counterparts may be signed electronically and exchanged via email or fax. These Minutes of Settlement may be executed by Counsel on behalf of clients. These Minutes of Settlement shall enure to the benefit of and be binding upon the Parties and the Mediator, their heirs, executors, administrators, successors and assigns.

EXECUTED by the Parties as of the date below.

**DATE** \_\_\_\_\_

\_\_\_\_\_  
[Counsel]  
Lawyer for the Plaintiff(s)

\_\_\_\_\_  
[PARTY]  
Plaintiff

\_\_\_\_\_  
[Counsel]  
Lawyer for the Defendant(s)

\_\_\_\_\_  
[PARTY]  
Defendant

\_\_\_\_\_  
[Counsel]  
Lawyer for the Defendant(s)

\_\_\_\_\_  
[PARTY]  
Defendant