

INTRODUCTORY CLAUSES

Practice Note

Settlement agreements have to start somewhere. Frequently the parties use an introductory clause that states the purpose of the terms of agreement that follow.

The parties to the above-referenced action agree that:

It is hereby agreed between Appellant and the Agency as follows:

This Agreement completely and finally resolves Appeal [number], dated [date].

The parties, desiring to fully and finally settle the appeal, agree as follows:

This Agreement is entered between Appellant and the Agency on the following terms:

The undersigned parties agree to the following terms in settlement of Appeal No. [number].

To resolve this appeal without further litigation, the parties agree to the terms that follow:

By entering this Agreement, Appellant settles her MSPB appeal [docket number], and accepts the following Agreement.

This Agreement is entered between the Agency and Appellant to settle all matters pertaining to the Appellant's MSPB appeal.

The Appellant and the Agency, through their counsel, settle the MSPB appeal on the terms below.

Under the terms set out below, the Agency and the Appellant fully, finally settle her appeal.

This Agreement resolves the disputes, claims, and issues related to and arising from the Appellant's MSPB appeal and EEO complaint.

To avoid further litigation, the Agency and Appellant settle Appellant's MSPB appeal and EEO complaints on the following terms.

Complainant and the Agency set out below the following voluntary and complete terms of settlement of this complaint.

Desiring to resolve this case rather than prolong litigation, the parties resolve to settle these matters in accordance with the following:

Appellant and the Agency agree to resolve all matters regarding her employment with the Agency, including her MSPB appeal, pursuant to the terms that follow.

In accordance with the EEO program and to avoid the delays and uncertainties of litigation, the parties settle the EEO complaint on the following terms:

To avoid the prolongation, delays and expense of an MSPB appeal, the parties resolve their differences in accordance with the following terms.

To advance the EEO program and to avoid unnecessary litigation, the Agency undertakes to settle the Complainant's EEO complaint on the following terms:

termination of the employment of [name].