INTRODUCTORY CLAUSES

Practice Tip

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.

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

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

The Agency is represented by [name] and the Appellant is represented by [name].

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

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

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

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

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

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

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

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

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

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.

In consideration of the terms below and the benefits to both parties established by those terms, the parties agree to the following settlement.

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

This Agreement is voluntarily made and entered into for the purpose of amicably, finally, and fully resolving all disputed issues between the parties.

In the interests of government efficiency, the parties enter into this Agreement in complete settlement of this Merit Systems Protection Board appeal.