

STATE OF MINNESOTA

DISTRICT COURT

RAMSEY COUNTY

SECOND JUDICIAL DISTRICT

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Elisabeth Anne Slattery,

Case Type: Personal Injury

Court File No. 62-CV-18-2964

Plaintiff,

vs.

**SETTLEMENT AGREEMENT AND  
RELEASE**

Thomas Mark Conrin and  
City of St. Paul,

Defendants.

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This Settlement Agreement and Release is made by and between Plaintiff Elisabeth Anne Slattery and Defendants Thomas Mark Conrin and City of St. Paul.

WHEREAS, Plaintiff served a civil complaint in this matter alleging that Defendants are liable for injuries and damages alleged to have been sustained by Plaintiff in an accident which occurred on June 25, 2015 on a path at or near Shepard Road and Chestnut in the City of Saint Paul, County of Ramsey, State of Minnesota as alleged in Plaintiff's Complaint;

WHEREAS, Defendants expressly deny the Plaintiff's allegations and liability for her alleged injuries;

WHEREAS, the parties wish to settle and resolve all outstanding disputes and claims between them to avoid the uncertainties and costs associated with continued litigation of this matter.

NOW, THEREFORE, in consideration of the mutual promises established herein, the parties agree as follows:

1. Upon formal approval by the Saint Paul City Council, the City of St. Paul will issue a check in the amount of Fifteen Thousand Dollars (15,000.00) payable to Elisabeth Anne Slattery and her attorneys Swor & Gatto, P.A. Payment will be issued within a reasonable time following the City Council's approval of this Agreement.

2. In consideration of the payments made pursuant to paragraph 1 above, Plaintiff releases, acquits and forever discharges Defendants City of Saint Paul and Thomas Conrin and their agents, servants, successors, heirs, executors, administrators and all other persons, firms, corporations, associations or partnerships of and from any and all claims, actions, causes of action, demands, rights, damages, costs, loss of service, expenses, attorneys' fees and compensation whatsoever which Plaintiff now has or which she may hereafter accrue on account of or in any way growing out of any and all known and unknown, foreseen and unforeseen, bodily and personal injuries and property damage and the consequences thereof resulting from the automobile accident which occurred on or about June 25, 2015.

3. Plaintiff hereby declares and represents that the injuries sustained are or may be permanent and progressive and that recovery therefrom is uncertain and indefinite and in making this release it is understood and agreed that Plaintiff relies wholly upon her judgment, belief and knowledge of the nature, extent, effect and duration of said injuries and liability therefore and is made without reliance upon any statement or representation of the parties hereby released or their representatives.

4. It is understood and agreed that this settlement is the compromise of a doubtful and disputed claim and that the payment made is not to be construed as admission of liability on the part of the parties hereby released and that said releasees deny liability therefore and intend merely to avoid litigation and buy their peace.

5. Plaintiff agrees that she will be responsible for obtaining a complete discharge of any and all existing or potential medical liens filed in regard to injuries he received as a result of the June 25, 2015 accident and further agrees that she will satisfy from the proceeds of this settlement all liens that have been made or may be made in the future. Plaintiff agrees to defend and hold the City of St. Paul and Thomas Conrin harmless from the same.

6. Plaintiff further declares and represents that no promise, inducement or agreement not expressed herein has been made to her and that this release contains the entire agreement between the parties hereto and that the terms of this release are contractual and not a mere recital.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Elisabeth Anne Slattery, Plaintiff

SWOR & GATTO, P.A.

Dated: \_\_\_\_\_

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Marcus P. Gatto #0391160  
345 Saint Peter Street, Suite 1280  
Saint Paul, MN 55102  
Telephone: (651) 454-3600  
Email: [marcusg@sworgatto.com](mailto:marcusg@sworgatto.com)  
*Attorneys for Plaintiff*

LYNDSEY OLSON  
Saint Paul City Attorney

Dated: \_\_\_\_\_

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Megan D. Hafner, # 293751  
Assistant City Attorney  
750 City Hall and Court House  
15 West Kellogg Boulevard  
Saint Paul, MN 55102  
651- 266-8756  
[megan.hafner@ci.stpaul.mn.us](mailto:megan.hafner@ci.stpaul.mn.us)  
*Attorneys for Defendants*