

**SETTLEMENT AGREEMENT AND RELEASE BETWEEN
GLENN SLAUGHTER AND THE CITY OF ST. PAUL**

This Settlement Agreement and Release is made by and between Glenn Slaughter and the City of St. Paul.

WHEREAS, Mr. Slaughter, who was not the subject of police activity, was bit and injured by a St. Paul Police Department canine on July 5, 2018;

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

WHEREAS, the parties to this Settlement Agreement and Release have successfully conciliated all issues of dispute related to the events on July 5, 2018.

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

1. The City of St. Paul will issue payment to Glenn Slaughter and his counsel at Gaskins, Bennett, Birrell, Schupp, LLP, for seventy-five thousand dollars (\$75,000.00) within a reasonable time following the City Council's approval of this agreement. This payment is in complete satisfaction for all damages, medical liens, costs and attorneys' fees in this matter for Mr. Slaughter. Mr. Slaughter will be responsible for payment of valid liens and subrogation claims.

2. In consideration of the above payment Mr. Slaughter, by execution of this Settlement Agreement and Release, hereby fully and completely releases the City of St. Paul, and all of the past and present agents, officers and employees, predecessors, and

successors in interest of the City of St. Paul in their official and individual capacities, of any and all claims for damages, costs and attorneys' fees which he has or may have, whether presently known or unknown, arising in law or in equity, which were made, or which could have been made, in the above-entitled action. Mr. Slaughter agrees that upon execution of this Settlement Agreement and Release all such claims, differences, demands, rights, and causes of action, which he now has or may have against the City of St. Paul, and all of the past and present agents, officers, and employees, predecessors, and successors, and successors in interest of the City of St. Paul, in their official and individual capacities, whether currently known or unknown, arising in law or equity, which were made or which could have been made in the above-entitled action, are fully released, satisfied, discharged and settled. This means that Mr. Slaughter releases all employees of the City of St. Paul from any and all claims for damages, costs and attorneys fees, known or unknown, that were or could have been brought in relation to the set of facts presented in the above-entitled action.

3. The parties to this Settlement Agreement and Release hereby stipulate that the payment of the sum specified above includes any claim for attorneys' fees and costs which could have been brought in relation to the events on July 5, 2018.

4. Mr. Slaughter agrees that the terms of this Settlement Agreement and Release are binding on him and his personal representatives, heirs, successors and assigns.

5. The parties agree that this Settlement Agreement and Release constitutes all of the agreements and understandings between Mr. Slaughter and the City. There are no

other written or oral agreements or understandings which modify the terms set forth in this Settlement Agreement and Release.

6. Mr. Slaughter, by execution hereof, acknowledges that this Settlement Agreement and Release has been read by his legal counsel, and that he understands and fully agrees to each and every provision hereof.

Dated:

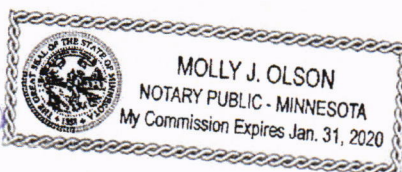
Glenn Slaughter
Glenn Slaughter

Subscribed and sworn to before me
on Nov. 20, 2018

Molly Olson
Notary Public

Tax ID Number

My Commission Expires 1-31-2020



Dated:

11-20-18

GASKINS, BENNETT, BIRRELL, SCHUPP,
LLP

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Attorneys for Mr. Slaughter

Dated: 11/20/18

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