

SETTLEMENT AGREEMENT AND RELEASE

State Farm Mutual Automobile Insurance Company for the sole consideration of \$20,000 to the undersigned in hand paid, receipt of which is hereby acknowledged, does hereby and for its heirs, executors, administrators, successors and assigns, releases, acquits and forever discharges the City of St. Paul and its agents, employees, servants, successors, heirs, executors, administrators and all other persons, firms, corporations, associations or partnerships of and from any and all claims including claims for indemnity of no-fault benefits paid pursuant to Minn. Stat. § 65B.53, as well as any other actions, causes of action, demands, rights, damages, costs, loss of services, expenses, attorney's fees and compensation whatsoever which the undersigned now has or which it 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 or to result from the accident, casualty or event which occurred on or about November 14, 2010 at or near the intersection of Wabasha Street and Fillmore Avenue, City of St. Paul, County of Ramsey, State of Minnesota.

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 an admission of liability on the part of the party hereby released and that said releasee denies liability therefore and intends merely to avoid litigation and buy its peace.

State Farm Mutual Automobile Insurance Company hereby declares and represents that the injuries sustained by its insured are or may be permanent and progressive and that recovery therefrom is uncertain and indefinite and in making this

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release it is understood and agreed that the undersigned relies wholly upon the undersigned's 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 party hereby released or their representatives.


The undersigned further declares and represents that no promise, inducement or agreement not expressed herein has been made to it 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.

The undersigned understands and agrees that settlement of its claim will not be effective until formal approval by the Saint Paul City Council.

Dated: _____

Samantha O. Sutton, Attorney for
State Farm Automobile Insurance Company

Dated: 7/23/15



Paul Novak, Claim Representative
State Farm Mut. Auto. Ins. Co.