

SETTLEMENT AGREEMENT AND RELEASE

The undersigned Plaintiff LTF Real Estate Company, Inc. hereby agrees to make and Defendant City of Saint Paul agrees to accept payment in the amount of \$220,000 in full settlement of the City's 2015 Highland Village Streetscape Assessment in the charged amount of \$333,532.85. In making this release, Plaintiff agrees to release, acquit and forever discharge the City, its agents, servants, successors, heirs, executors, administrators and all other persons, firms, corporations, associations or partnerships of and from any claims regarding the Highland Village Streetscape Project as well as any damages, costs, loss of service, attorneys' fees, expenses 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 damages and the consequences thereof regarding all claims as set forth in Plaintiff's September 16, 2015 Objection to Assessment and Plaintiff's Complaint and Notice of Appeal pursuant to Minn. Stat. § 429.081 and Saint Paul City Charter § 14.01.4 dated September 29, 2015 and filed in the Ramsey County District Court.

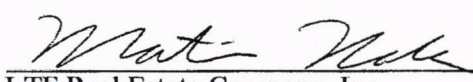
It is understood and agreed that this settlement is the compromise of a disputed claim and that the payment made is not to be construed as an admission of liability on the part of either party.

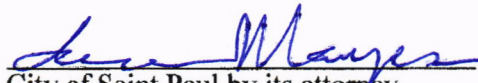
It is understood and agreed by the parties that Plaintiff's 2015 Street Assessment Appeal which is currently stayed in the Ramsey County District Court is not affected in any way by this settlement.

The undersigned 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.

It is agreed that this Settlement shall be submitted for approval to the Saint Paul City Council once this Settlement Agreement has been signed by Plaintiff and returned to the City.

Dated: 3/10/17 
Representative of LTF Real Estate Company, Inc.

Dated: 3-10-17 
LTF Real Estate Company, Inc.
Attorney ~~Patrick J. Kelly~~ Martin Norder

Dated: 3/13/17 
City of Saint Paul by its attorney
Lawrence J. Hayes, Jr.