

## **SETTLEMENT AGREEMENT AND RELEASE**

The undersigned Mark Finkelshteyn as trustee for the next of kin of Roza Sakhina, being of lawful age, for the sum of \$62,500.00 to the undersigned in hand paid, receipt of which is hereby acknowledged, does hereby and for the heirs, next of kin, executors, administrators, successors and assigns of Roza Sakhina, releases, acquits and forever discharges Defendants Lori Lin Goulet and City of St. Paul and their agents, servants, successors, employees, 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 services, loss of guidance, aid, advice, comfort, assistance and companionship of decedent Roza Sakhina, expenses and compensation whatsoever which the undersigned as trustee for the next of kin of Roza Sakhina which he now has or which he 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, which occurred on August 16, 2013 on Cleveland Avenue South near the intersection of West Saunders 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 parties hereby released and that said releasees deny liability therefore and intend merely to avoid litigation and buy their peace.

The undersigned declares and represents that no promise, inducement or agreement not expressed herein has been made to the undersigned 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 agrees that he will obtain a complete discharge of any and all liens filed in regard to injuries received or medical treatment rendered to decedent Roza Sakhina as result of the August 16, 2013 accident, including but not limited to liens of Optum, UCare and/or Medicare and further agrees that he will satisfy from the proceeds of said settlement all liens that have been made or may be made in the future regarding said accident. The undersigned shall provide written documentation demonstrating that any applicable liens have been satisfied or otherwise resolved.

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

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Mark Finkelshteyn as trustee for the next of kin  
of Roza Sakhina