

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Personal Injury

Ramla A. Bile,

Court File No. 62-CV-14-3235

Judge John B. Van de North

Plaintiff,

vs.

**SETTLEMENT AGREEMENT
AND RELEASE**

Jordan C. Carlson and
City of St. Paul,

Defendants.

Plaintiff Ramla Bile, for the sole consideration of one hundred ten thousand dollars and no cents (\$110,000.00), does hereby release and forever discharge Defendants Jordan Carlson, the City of St. Paul and its employees, heirs, administrators, executors, successors and assigns from any all claims, demands, damages, actions and causes of action of whatever kind or nature which she now has or may have or may hereafter have arising out of, or in consequence of, or on account of any damages, losses or injuries to persons or property or both, whether known or unknown, whether developed or undeveloped, apparent and/or latent, anticipated and/or unanticipated resulting or to result from an accident which occurred on October 12, 2011, at or near the intersection of Dale and St. Anthony in the 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 her, that this Settlement Agreement and Release contains the entire agreement between the parties hereto, and that the terms of the Settlement Agreement and Release are contractual and not a mere recital.

The undersigned agrees that she will be responsible for obtaining a complete discharge of any and all liens filed or to be filed in regard to the events described in Plaintiff's Complaint, 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 regarding said accident. In this regard, the undersigned will provide the releasees with documentation demonstrating that actual or potential liens have in fact been satisfied. The undersigned specifically agrees to pay from the settlement proceeds outstanding medical bills in the amount of \$1,639.00.

The parties to this Agreement agree that final approval of this settlement shall be made by the St. Paul City Council. The parties and their counsel hereby agree not to comment on the settlement to the media. If the parties and their counsel are approached by the media or other third parties, the parties and their counsel agree to state that the case was resolved to the mutual satisfaction of the parties and their counsel, and to respond to any further inquiries by saying "no comment."

The undersigned has read the foregoing Release and fully understands it.

Dated: _____

Ramla A. Bile, Plaintiff