

MEMORANDUM OF SETTLEMENT

Case: **Curtsinger v. City of Yakima**

Curtsinger (Claimant) and City of Yakima (Respondent) agree to settle this litigation on the following bases:

- 1. Respondent will pay Claimant \$650,000.00 USD (gross) in full settlement of any claims against Respondent; in addition, Respondent shall pay Claimant's cost of mediation.**
- 2. Claimant will execute a release and hold harmless agreement in favor of Respondent as to all claims and specifically satisfy any subrogated liens or claims.**
- 3. The parties will work together to formalize this Agreement with appropriate documentation.**
- 4. The settlement is specifically contingent upon the City Council of the City of Yakima approving the settlement.**
- 5. A copy of this memorandum may be introduced into evidence in any proceeding to enforce this settlement as a CR 2A document.**

Signed this 14th day of April, 2021.

Claimant Jack Curtsinger

Counsel for Curtsinger
Tax ID No. _____

Counsel for City of Yakima
