


CR 2A Memorandum of Settlement Agreement

On February 18, 2022, the parties engaged in post-mediation settlement discussions in the matter *Gary Dobbs v. City of Yakima, et al*, Yakima County Superior Court, Cause No. 19-2-01802-39, with mediator Teresa Wakeen. Under the agreement reached post-mediation, the parties agree as follows:

1. Clear Risk Solutions agrees to pay Plaintiff Gary Dobbs, individually, (herein "Plaintiff"), a total of \$170,000.00 (One Hundred Seventy Thousand Dollars) in exchange for Plaintiff's execution of a full release of all past, current, future, or potential claims, including all claims for attorney's fees and costs, that have been or could have been asserted in Yakima County Superior Court, Cause No. 19-2-01802-39;
2. In exchange for said payment, Plaintiff agrees to execute a Settlement and Full Release of all claims asserted against the City of Yakima ("Defendant") and any and all of its past, current, or future agents, officers, and employees that includes an indemnification and hold harmless releasing the City of Yakima and their past, current, or future agents, officers, and employees from any and all liens that may be asserted as a result of the Amended Complaint filed in Yakima County Superior Court, Cause No. 19-2-01802-39. Plaintiff further agrees to enter a stipulated order dismissing all claims with prejudice in the aforementioned cause of action, with each party bearing their own costs;
3. This settlement is contingent on approval by the Yakima City Council, which is expected to convene on this matter on or about March 15, 2022;
4. This settlement is further contingent on Plaintiff successfully eliminating any medical liens he may have related to *Gary Dobbs v. City of Yakima, et al*, Yakima County Superior Court, Cause No. 19-2-01802-39;
5. Each party shall bear its own costs for the mediation with Teresa Wakeen; and
6. The parties agree that any disputes regarding the Settlement and Full Release and/or any other matters pertaining to this settlement will be submitted to mediator Teresa Wakeen for binding resolution.

Signed this 18th day of February, 2022.



Favian Valencia,
Counsel for Plaintiff

Megan M. Coluccio
Counsel for Defendant City of Yakima