

CR 2A AGREEMENT

The parties to the case now pending in the King County Superior Court, cause number 16-2-22576-4 SEA, state that they reached a full and complete settlement agreement in conversations on January 12, 2018 and that agreement is memorialized below. The following are the key settlement terms:

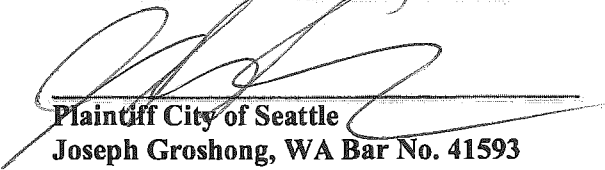
1. The parties to this agreement are:

Plaintiff: The City of Seattle


Defendants:

1. Kostas A. and Linda C. Kyrimis
 2. Nancy A. Despain and Wendy S. Sweigart
 3. Leroy and Joyce Bernard
 4. Charles E. and Shirley J. King
 5. Bruce Gross
2. Defendants, through their respective insurers, shall pay the total sum of \$360,000 to Plaintiff for a full resolution of this matter.
3. The parties will work together to formalize this settlement with a release/hold harmless agreement and the case shall be dismissed with prejudice, and without fees or costs to any party.
4. Payment of the total sum of \$360,000 will be in exchange for settlement and release of all claims of any kind (statutory and/or municipality penalties and fines, damage claims, restoration claims, etc.) against the named defendants, with regard to any and all tree or foliage cuttings, trimmings, or removal in the locations referenced in the Complaint that occurred on or before January 1, 2018.
5. A copy of this agreement may be introduced into evidence in any proceeding to enforce this Settlement Agreement as a CR 2A document. In any action to enforce this agreement, the successful party shall be entitled to their reasonable attorney fees and expenses.
6. This agreement may be signed in counterparts.

Dated 31 of January, 2018


Plaintiff City of Seattle
Joseph Groshong, WA Bar No. 41593
Stephanie Dikeakos, WA Bar No. 27463
Scott Kennedy, WA Bar No. 46747
Assistant City Attorneys


Dated 30 of January, 2018


Heather M. Jensen, WA Bar No. 29636
William W. Simmons, WA Bar No. 35604
Attorneys for Defendants Kostas A. and
Linda C. Kyrimis

Dated ___ of _____, 2018


Alan J. Peizer, WA Bar No. 7002
Attorney for Defendants Nancy De Spain
and Wendy Sweigart


Dated ___ of _____, 2018


Peter Sutherland, WA Bar No. 17745
Attorney for Defendant Bruce Gross

Dated 30th of January, 2018


George A. Mix, WA Bar No. 32864
Attorney for Defendants Charles and
Shirley King

Dated 30 of January, 2018


David J. Wieck, WA Bar No. 16656
Attorney for Defendants Leroy and
Joyce Bernard

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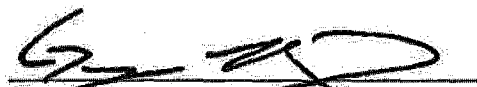
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