

**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:

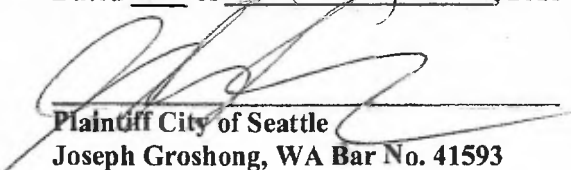
1. The parties to this agreement are:

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 \_\_\_\_ of \_\_\_\_\_, 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 31 of Jan, 2018

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

Dated \_\_\_\_ of \_\_\_\_\_, 2018

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

Dated 30th of January, 2018

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

Dated 30th of January, 2018

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