

**IN THE CIRCUIT COURT OF THE 16th JUDICIAL CIRCUIT
IN AND FOR MONROE COUNTY, FLORIDA**

**JOANNA SCHULER,
Plaintiff,**

vs.

CASE NO.: 2019-CA-21-K

**CITY OF KEY WEST,
Defendant.**

_____ /.

MEDIATION AGREEMENT

WHEREAS, Joanna Schuyler (hereinafter referred to as “Plaintiff”) allege in a Complaint for Negligence filed in Monroe County, Florida that on or about December 26, 2017, Plaintiff fell off of her bicycle while traversing the Staples Avenue Bridge in Key West, Florida; and,

WHEREAS, as a result of said fall, Plaintiff suffered personal injuries to her left elbow resulting in surgery; and,

WHEREAS, the parties agree to resolve the above captioned personal injury case without further litigation without either party admitting any fault or liability regarding the alleged personal injury; and,


WHEREAS, the parties attended a mediation held by Hon. Sandra Tayler on August 11, 2021; and,

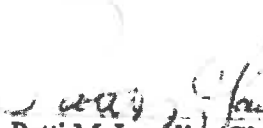
NOW, THEREFORE, for good and valuable consideration acknowledged herein, the parties enter into this settlement agreement as described in detail below:

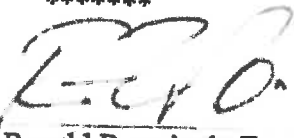
1. The City shall pay \$120,000.00 to Plaintiff to resolve her personal injury claim subject to approval by the City Commission of the City of Key West.

2. Plaintiff shall execute a Release of All Claims to be signed by the Plaintiff running to the benefit of the City of Key West and its insurance company, agents, and representatives shall be incorporated and made part of this Settlement Agreement forthwith.
3. Plaintiff agrees to execute a *Dismissal with Prejudice* of the above styled cause of action within 5 business days of receiving payment from the City of Key West, or its insurance company.
4. The parties agree that the amounts in paragraph 1 represents good and valuable consideration for this Settlement Agreement.
5. Plaintiff understands that as a settlement with a public agency subject to the Florida Opens Meetings Law and Public Records Law certain health information regarding this claim may be made available to the City Commission at its meeting and Plaintiff hereby expressly consents to same.

 date 8/11/2021
 Joanna Schuyler (Plaintiff)

 date 8/11/2021
 John Phillips (Counsel for Plaintiff)

 date 8/11/21
 Patti McLauclin (City Manager)

 date 8/11/2021
 Ronald Ramsingh, Esq. (Counsel for City of Key West)