

IN THE CIRCUIT COURT OF THE SIXTEENTH JUDICIAL CIRCUIT
IN AND FOR MONROE COUNTY, FLORIDA

MATTHEW KLOSOWSKI,
Plaintiff,

CASE NO.: 2007-CA-1642-K
HONORABLE WAYNE MILLER

vs.

CITY OF KEY WEST,
a municipal corporation, acting through
WILLIAM A. MAULDIN, then Chief
Key West Police Department, a department
of Defendant City of Key West,
Defendants.

STIPULATED SETTLEMENT AGREEMENT

COMES NOW, the Plaintiff Matthew Klosowski and the Defendant, City of Key West, by and through their respective counsel, and file this above-captioned pleading and state as follows:

1. Plaintiff and Defendant voluntarily enter into the following Stipulated Settlement Agreement, intending to resolve all issues between them.
2. Plaintiff and Defendant hereby settle any and all claims in the above-styled cause for the total amount of TWO HUNDRED EIGHTY-SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$287,500.00) paid in good funds to the trust account of counsel for the Plaintiff within 30 days upon approval by the City Commission of the City of Key West.
3. The Parties understand and agree that it each party will be responsible for its own costs and attorney's fees related to this Civil Action.
4. At such time as full payment is made, the respective cause of action shall be dismissed with prejudice and in consideration for the covenants contained herein, Matthew

Klosowski expressly agrees to execute any and all documentation necessary to release the City of Key West, its officials, insurers and agents for all liability whatsoever resulting from the subject matter of the case referenced herein and any matter concerning his separation from the City of Key West.

5. This Stipulated Settlement Agreement constitutes the final agreement of Parties and may not be amended except in writing. This Stipulated Settlement Agreement shall be contingent on the approval by the City Commission of the City of Key West and shall be effective immediately upon their approval.

WHEREFORE, the Parties request that this Stipulated Settlement Agreement be entered into the records of this cause.

Counsel for Defendant City of Key West

Office of the City Attorney
City of Key West
P.O. Box 1409
Key West, FL 33041-1409
(305) 809-3770
(305) 809-3771

BY: _____
SHAWN D. SMITH
City Attorney
FBN 0138754

Dated: _____

City of Key West and Office of the
Chief of Police

Dated: _____

Counsel for Plaintiff Matthew Klosowski

Law Office of Michael R. Barnes, P.A.
107 Dolphin Drive
St. Augustine, FL 32080
(305) 797-5297



BY: _____
MICHAEL R. BARNES
Attorney for Plaintiff
FBN 0906565

Dated: __ September 16, 2014 __



Matthew Klosowski

Dated: __ September 16, 2014 __