CR 2A AGREEMENT

The undersigned parties, on this 16th day of November 2021, attended a mediation with Keith Bolton, and agreed to the following settlement of their dispute concerning Ogbai v. Hurley:

TERMS

1. Defendant shall pay to Plaintiff the total sum of $23,000, as payment in full of all claims arising from the events described in the complaint.

2. The Plaintiff agrees to accept the above sum with the knowledge that he will be barred from proceeding against the Defendant in the future concerning this matter.

3. The parties stipulate that the settlement does not constitute an admission of liability.

4. Further conditions of the settlement are as follows:

1. Plaintiff and Defendant shall execute a request for dismissal of the entire action with prejudice to be filed at such time as Plaintiff holds the funds described above.

b) Plaintiff and Defendant shall execute a full and complete release prepared by the Defendant’s counsel releasing Defendant from all claims, known or unknown. The release shall contain a standard confidentiality and non-disparagement clause. Plaintiff's counsel shall not distribute settlement funds until all parties have executed the release.

c) Each party shall bear their own costs and attorney’s fees.

d) This agreement shall be deemed drafted by all parties with the advice of counsel for the purposes of its interpretation, sufficiency, and enforcement.

5. This Settlement Agreement is binding on the parties pursuant to CR 2A.

PARTIES LAWYERS/INSURERS

Parties (Plaintiffs/Defendants) Their Representatives (and other participants)

/s/ Ermias Ogbai\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ /s/ Neftalem Habtemariam\_\_\_\_\_\_\_\_\_\_\_\_\_

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