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June 23, 2014

The Honorable Common Council
City of Milwaukee
Milwaukee City Hall – Room 205

Re: Proposed resolution to approve settlement of the claims.
*Jeanine L. Jackson v. City of Milwaukee, Gary Cherone, Adam Freund,
and Jason Mucha*, United States District Court of the Eastern District of
Wisconsin Case No. 12-CV-490.

Dear Council Members:

Enclosed is a proposed resolution recommending settlement of the above-referenced claim, which we ask be introduced and referred to the Committee on Judiciary and Legislation for its recommendation.

Plaintiff, Jeanine Jackson, alleges that on May 19, 2009, her civil rights were violated when Milwaukee police officers improperly assisted a private entity in the repossession of her motor vehicle. She claims damages related to the value of her vehicle, lost business inventory that was in the trunk of the vehicle, and lost business revenues. She additionally claims punitive damages, compensatory damages, and mounting attorney's fees and costs.

Because of the unpredictability of trial, and the City's risk for exposure to not only compensatory damages, but also to punitive damages and attorney's fees, a modest settlement amount was negotiated following mediation in the amount of \$8000.00, inclusive of attorney's fees. We recommend that this matter be settled for that



amount. Consistent with our recommendation, we have enclosed an appropriate resolution for your consideration.

Very truly yours,

GRANT F. LANGLEY,
City Attorney

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