

CCFN 150327

**FULL SETTLEMENT AND FINAL RELEASE OF ALL UNINSURED
MOTORIST CLAIMS AGAINST THE CITY OF MILWAUKEE**

Frank Vrtochnick, in consideration of Twenty Five Thousand Dollars and No Cents (\$25,000.00), and other good and valuable consideration, the receipt of which is hereby acknowledged, does hereby forever release and discharge the City of Milwaukee (hereafter referred to as the released party) from any and all claims and causes of action for uninsured motorist coverage (benefits), in any way arising out of or related to, an incident which occurred on or about December 25, 2011, at or near the intersection of West Windlake Avenue and South 18th Street, City and County of Milwaukee, Wisconsin, and more particularly described in Milwaukee County Circuit Court Case No. 2014-CV-010660.

This Release by Frank Vrtochnick is also made for and binding upon my heirs, successors and assigns. By this agreement any liability of insurers, predecessors, successors, officers, directors, agents and/or employees of the released party are also released and discharged.

This Release fully extinguishes all claims and causes of action against the City of Milwaukee for uninsured motorist coverage (benefits), including but not limited to those for: compensatory damages; loss of society, companionship and consortium; claims under Wis. Stat. § 62.67; punitive damages; costs and fees; attorneys' fees; and statutory damage awards. This Release also fully extinguishes any claims or causes of action under the Wisconsin Uniform Marital Property Act. In making this Release, all rights to bring any other claims against the released party for uninsured motorist coverage (benefits) are fully extinguished. Frank Vrtochnick is expressly reserving all other potential claims against the City of Milwaukee including, but not limited to, worker's compensation claims, ordinary and duty disability claims, and claims under any applicable collective bargaining agreement.

the settlement. In making this representation Frank Vrtochnick agrees to indemnify the released party for any money they may have to pay to any other person or entity asserting any claim arising out of or related to any injuries or damages sustained in this incident, including any claims based upon subrogation, derivation or assignment. Also, I will indemnify the released party for all expenses, including attorneys fees, incurred in defending such claims.

I understand that in making this Release I will have no right to make a claim for uninsured motorist coverage (benefits) against the released party for more money even if I later become dissatisfied with this settlement for any reason whatsoever.

The statements in this Full Settlement and Final Release of All Uninsured Motorist Claims against the City of Milwaukee are contractual terms, and are not mere recitals. Any questions concerning this Release shall be determined and governed by the terms of this Release and the law of the State of Wisconsin.

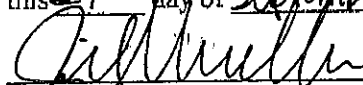
I have read this Release, which consists of four pages, and understand that it is a full and complete compromise and full settlement of all claims for which I have been fully compensated.

Dated this 29th day of September, 2015.



FRANK VRTOCHNICK

Subscribed and sworn to before me
this 29th day of September, 2015.



NOTARY PUBLIC - State of Wisconsin
My Commission: is permanent

As attorney for Frank Vrtochnick, I have reviewed the terms of this settlement. I consent to this settlement as required by Wisconsin Statute Sec. 757.38.

Dated this 29 day of September, 2015.



MACGILLIS WIEMER, LLC
Attorneys for Frank Vrtochnick

SDW 1068944