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September 18, 2015

To the Honorable Common Council of the City of Milwaukee Room 205 – City Hall

RE: Edward Earl Wright v. Michael Vagnini, et al.

Case No. 14-C-1224

Dear Council Members:

Enclosed is a proposed resolution and fiscal note authorizing payment of a settlement amount regarding the above-referenced matter. We request that the enclosed documents be referred to the appropriate committee for review.

Mr. Wright brought suit regarding events which occurred on October 21, 2011. In short, he claims that he was unlawfully stopped and searched by MPD officers. To date, counsel has incurred approximately \$30,000.00 in 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, we recommend that this matter be settled for the total amount of \$35,000.00. Consistent with our recommendation, we have enclosed an appropriate resolution for your consideration.

Very truly yours.

GRANIF, LANGLE

SUSAN E. LAPPEN Assistant City Attorney

Enclosures

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