

## CR 2A Agreement

*Kleutsch vs. State of Washington - DOC*  
King County Superior Court Cause No. 20-2-06902-7 SEA

The parties represent, through their respective attorneys of record, that they have binding settlement authority for their clients and have agreed to resolve the above-referenced matter for \$3,250,000.00 (Three million two hundred fifty thousand dollars only). This settlement amount is for general damages only and is expressly agreed to in exchange for a full release of any and all claims that plaintiff has against the State of Washington and its agencies and employees for incidents or events raised or that could have been raised in the above-referenced matter.

Each party is responsible for its own fees and costs.

The defendant's lawyer will provide settlement documentation to the plaintiff's lawyer that will include a full Release of all claims and hold harmless provisions. Plaintiff's counsel, on behalf of plaintiff, will satisfy all liens, if any, directly from the settlement proceeds. Plaintiff remains responsible for all liens of any kind related to the claims in this matter and shall hold the defendant harmless from all such liens.

Plaintiff reserves the right to structure (annuitize) any portion of the net settlement proceeds with the assistance of a broker of plaintiff's choice working with Kathy Osler, the State's annuity broker for these matters.

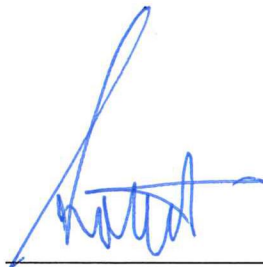
The State of Washington must utilize a stipulated judgment procedure in order to properly fund the settlement proceeds. Payment shall be made in accordance with ordinary state procedures and state law including RCW 4.92.150 and .160. The parties agree to execute a stipulated judgment for the claims against the State of Washington and its agencies. The parties agree that all claims shall be dismissed with prejudice at the appropriate time.

Plaintiffs' counsel shall provide their firm's tax identification number, a current W-9 for their firm, and an MMSEA Reporting Compliance Declaration.

So stipulated and agreed this 28<sup>th</sup> day  
of May 2021:

ROBERT W. FERGUSON  
Attorney General  
Scott Barbara WSBA# 20885  
Assistant Attorney General  
Attorney for Defendant  
State of Washington

CONNELLY LAW FIRM  
Attorneys for Plaintiff  
Lincoln Beauregard,  
WSBA # 32878  
Marta O'Brien, WSBA #46416  
Attorneys for Plaintiff, Kleutsch



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