



Legal Department

144 N. Binkley Street, Soldotna, Alaska 99669 • (907) 714-2120 • (907) 714-2379 Fax

Charlie Pierce
Borough Mayor

May 22, 2019

VIA FEDERAL EXPRESS

Krista Hardwick
Shareholder
Lane Powell
1420 Fifth Avenue, Suite 4200
Seattle, WA 98101-2375

RE: Brown v. Kenai Peninsula Borough and Charles F. Pierce, Case No. 3KN-19-00067 CI

Dear Krista:

Enclosed please find the signed Settlement Agreement and Release of All Claims in the above case, a KPB check payable to the Law Offices of Judith A. Lonquist, P.S, In Trust – Sandra Brown for \$135,000 and a check payable to Sandra S. Brown for wages based upon a gross amount of \$15,000 after mandatory deductions. Please sign where indicated on page 3 and have the checks and a copy of the fully executed Settlement Agreement delivered to Ms. Lonquist.

It has been a pleasure to work with you and Peter through this case and in assisting us to reach a quick resolution.

Best regards,

A handwritten signature in blue ink, appearing to read "Colette Thompson", is written over a horizontal line.

Colette Thompson
Borough Attorney

cc: Peter Partnow, Counsel to Lane Powell PC
Charlie Pierce, Borough Mayor

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT KENAI

SANDRA (Stormy) BROWN,
Plaintiff,

v.

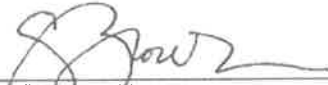
KENAI PENINSULA BOROUGH and
CHARLES F. PIERCE, individually and as its
Mayor,
Defendants.

Case No. 3KN-19-00067 CI

**SETTLEMENT AGREEMENT AND
RELEASE OF ALL CLAIMS**

The undersigned parties agree that the captioned dispute has been fully and finally settled pursuant to the terms and conditions of their mediation before Mediator Dana Fabe, as set forth on the record by Mediator Dana Fabe on May 10, 2019, copies of which are currently possessed by all counsel of record. Pursuant to the mediated agreement, the parties agree that all claims have been settled, that all claims are to be fully and finally released, that there is no admission of wrongdoing by either party, and that counsel for the parties shall file with the court a stipulated motion for dismissal with prejudice with all parties bearing their own costs and attorneys' fees, except as provided in the mediated agreement. The parties agree that this Settlement Agreement and Release may be executed in counterpart originals.

Dated: 5/20/19, 2019



Sandra "Stormy" Brown


KENAI PENINSULA BOROUGH

Dated: 5/21/2019, 2019

By 

Charles F. Pierce, its Mayor

Dated: 5/21/2019, 2019



Charles F. Pierce,
In his official and personal capacity

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

THIS IS TO CERTIFY, that on this 20th day of MAY, 2019, before me, the undersigned, a Notary Public in and for the State of Alaska, duly commissioned and sworn as such, personally appeared SANDRA (Stormy) BROWN, individually, known to me to be the person named in and who executed the within and foregoing instrument, and she acknowledged to me that she signed the same freely and voluntarily for the uses and purposes therein mentioned.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year first hereinabove written.



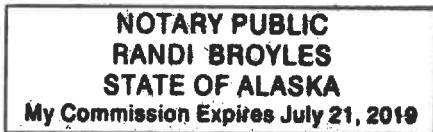
[Handwritten signature]

Notary in and for the State of Alaska
My commission expires: W/OFFICE

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

THIS IS TO CERTIFY, that on this 21 day of May, 2019, before me, the undersigned, a Notary Public in and for the State of Alaska, duly commissioned and sworn as such, personally appeared CHARLES F. PIERCE, Mayor of the KENAI PENINSULA BOROUGH, an Alaska Municipal Corporation, on behalf of the corporation and himself as the Mayor as well as himself individually, known to me to be the person named in and who executed the within and foregoing instrument, and he acknowledged to me that he signed the same freely and voluntarily for the uses and purposes therein mentioned on behalf of himself individually and the corporation and himself as the Kenai Peninsula Borough Mayor.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year first hereinabove written.



Randi Broyles

Notary in and for the State of Alaska
My commission expires: 07/21/19

APPROVED AS TO FORM

Attorneys for Plaintiff:
LAW OFFICES OF JUDITH A.
LONNQUIST, P.S.

Dated: 5/20/19

By Judith A. Lonquist
Judith A. Lonquist *pro hac vice*
LEE HOLEN LAW OFFICE

Dated: 5/21/19

By Lee Holen
Lee Holen, ABA No. 7810071

Attorneys for Defendants:

LANE POWELL LLC

Dated: _____

By _____
Peter C. Partnow, ABA No. 7206029
Krista N. Hardwick, ABA No. 1810084