

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

TRENA CLARK, as Next Friend of
[REDACTED], a Minor.

Plaintiff,

Case No. 07-709271 NH
Hon. Amy Hathaway

-vs-

MICHELLE KONIECZNY, M.D.,
ANU ADEYEMI, M.D.,
LINDA RUDIN-McCURRY, CRNA,
ANN McNEILL, CRNA and
HUTZEL HOSPITAL, f/k/a
HARPER-HUTZEL HOSPITAL,
Jointly and Severally,

Defendants.

SETTLEMENT AGREEMENT

The parties to this settlement agree as follows:

1. Plaintiff will accept the sum of \$100,000.00 from all the remaining Defendants in this case in full settlement of this case, and in exchange for this payment will fully and complete release all the remaining Defendants.
2. Plaintiff will be responsible for any and all liens and will indemnify and hold harmless these Defendants from any such liens.
3. The parties to this settlement agree to a non-disclosure provision, *not apply to MDCH*
4. Intervening Plaintiff has agreed to accept \$150,000.00 in full settlement of the lien that it has asserted in this case. This \$150,000.00 is comprised of \$125,000.00 of the prior settlement in this case and 25% of this settlement. *REC JPD*
5. The parties will cooperate in attendance at any necessary court appearances and the drafting and execution of the final settlement documents which will include the standard Kitch Release and Settlement Agreement.

Trena Clark

TRENA CLARK, as Next Friend of
[REDACTED], a Minor

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THOMAS R. SHIMMEL (R41280)
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Ramona C. Howard

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James P. Delaney

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