

SETTLEMENT AGREEMENT WITH RESPECT TO ATTORNEY'S FEES

This Settlement Agreement is entered into by and between Mary Burke Patterson, Robert E. Patterson, Melissa Jenkins, Valerie Ann Henry, Paula Childs, Carol Stenmark, David H. Stenmark ("Plaintiffs") and the Bonnet Shores Fire District, including its past and present council members, officers, employees, representatives, and agents ("Defendant").

WHEREAS, a certain dispute involving voting rights has arisen between Plaintiffs and Defendant; and

WHEREAS, the parties have negotiated the terms of a Consent Judgment awaiting submission and approval by the Court; and

WHEREAS, as part of the negotiations of that Consent Judgment, the parties have agreed that Defendant shall pay Plaintiffs a portion of the attorney's fees that they have incurred in pursuit of various claims set forth in a lawsuit filed in the Washington County Superior Court entitled *Mary Burke Patterson, et al. v. The Bonnet Shores Fire District*, C.A. No. WC-2020-0130 (the "Lawsuit"); and

WHEREAS, the parties have agreed that it is in their mutual interest to resolve all disputes relating to the Lawsuit, including the payment of Plaintiffs' attorney's fees.

THEREFORE, in consideration of the parties' mutual agreement to the terms set forth in the Consent Judgment, a copy of which is attached hereto as Exhibit A, and subject to its approval by the Honorable Sarah Taft-Carter, Defendant agrees to pay a total of \$40,000 toward Plaintiffs' fees incurred in pursuit of the Lawsuit, which fees shall be payable in two installments as follows: \$20,000 shall be payable within fifteen (15) days of the entry of the Consent Judgment and the remaining \$20,000 shall be paid on or before the one year anniversary date of

the first payment specified herein. The payment shall be made payable to "Oliverio & Marcaccio LLP IOLTA Account."

Acceptance and Acknowledgement

The parties represent that they have read carefully and fully understand the terms of this Agreement, and that they have consulted with their attorney prior to signing this Agreement.

Any breach of this Agreement by the parties shall entitle the other party to seek its enforcement and recover any fees and costs associated with its enforcement.

Acknowledged and agreed to:

Mary Burke Patterson
Mary Burke Patterson

Dated: May 21, 2022

Robert E. Patterson
Robert E. Patterson

Dated: May 21, 2022

Melissa Jenkins
Melissa Jenkins

Dated: 5/21/2022

Valerie Henry
Valerie Henry

Dated: 5/21/22

Paula Childs
Paula Childs

Dated: May 21, 2022

Bonnet Shores Fire District

By: Carol O'Donnell
Carol O'Donnell, Chair

Dated: May 20, 2022

Carol M Stenmark

Carol M. Stenmark

Dated: 5-21-22

David H Stenmark by Carol M Stenmark, executrix
of the Estate of David Stenmark

David H. Stenmark

By Carol M. Stenmark, Executrix of the
Estate of David H. Stenmark

Dated: 5-21-22