

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

ELLEN ABDUR-RAHIM,)	
<i>et al.</i> ,)	
)	
Plaintiffs,)	Civil Action No. 2:17-cv-00601
)	
v.)	
)	
THE CITY OF COLUMBUS,)	Judge: Edmund Sargus
<i>et al.</i> ,)	
)	Magistrate Judge: Chelsey Vascura
Defendants.)	

SETTLEMENT AGREEMENT

This Settlement Agreement is entered into by Ellen Abdur-Rahim, Plaintiff, and the City of Columbus on behalf of Justin Masters, Defendant, (together, the parties) for the purpose of compromising the disputed claims and avoiding further litigation. The parties agree to resolve this action without further proceedings subject to the following terms:

Key terms

1. The City of Columbus, on behalf of Defendant Justin Masters and in accordance with Ohio Rev. Code § 2744.07, will pay ten thousand dollars and zero cents (\$10,000.00), to Ellen Abdur-Rahim.
2. Ellen Abdur-Rahim, on behalf of herself, her heirs, executors, administrators, and assigns, will release and discharge Justin Masters and the City of Columbus, Ohio along with its officers, agents, employees, representatives, and assigns, of and from any and all liability, claims, damages, actions and causes of action on account of any and all injuries, damages, or losses of any kind and nature, past, present, or future, whether known or unknown, that has or could have resulted from any injury, loss, or damage to her or any of her property

that occurred at or near the intersection of High and State Streets, Columbus, Ohio on January 30, 2017 and is more fully described in a complaint that was filed in a civil action captioned *Ellen Abdur-Rahim, et al. v. The City of Columbus, et al.*, S.D. Ohio Case No. 2:17-cv-00601.

3. The parties agree to file a joint stipulation of dismissal with prejudice of the civil action captioned *Ellen Abdur-Rahim, et al. v. The City of Columbus, et al.*, S.D. Ohio Case No. 2:17-cv-00601 within seven days of Ellen Abdur-Rahim receiving the settlement payment identified in paragraph 1 above.
4. The parties agree to bear their own costs and expenses associated with litigating this case.

Miscellaneous terms

5. **Defendants' intent.** The payment of any consideration for this Agreement is not meant to be—and shall not be—construed as an admission of liability on the part of Justin Masters, the City of Columbus, Ohio or on the part of any of the City's officers, agents, employees, representatives, or assigns, and that the aforementioned parties deny engaging in any sort of alleged wrongdoing.
6. **Entire agreement.** This Agreement contains the entire agreement between the parties with respect to the claims discussed herein, and the terms of this Agreement are contractual and not mere recitals.
7. **Severability.** If any provision of this Agreement or the application thereof is adjudicated to be void, invalid, or unenforceable, such action shall not make the entire Agreement void, but rather only that provision. All remaining provisions shall remain in full force and effect.

8. **Forum.** Any action to enforce any provision of this Agreement must be brought before Judge Sargus in the Southern District of Ohio.
9. **Public record.** This Agreement in its entirety is a public record. The status as public records as defined under R.C. 149.43(A)(1) of any other records associated with this case shall be governed by R.C. 149.43.
10. **Executed separately.** The parties contemplate this Agreement may be executed in separate counterparts and all counterparts and signature pages together are one document.

SIGNATURES

s/ Michael R. Halloran

/s/ Elizabeth Bonham

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