

RELEASE OF ALL CLAIMS

FOR AND IN CONSIDERATION of a lump sum payment in the amount of Fifteen Thousand Dollars and Zero Cents (\$15,000.00), said payment to be issued on or before December 7, 2012, we, the undersigned Steve and Sharon Wolff (collectively "Petitioners"), individually and on behalf of their attorneys, agents, personal representatives, insurers, successors or predecessors in interest (collectively "Releasers") do hereby release, acquit and forever discharge the City of Rio Dell and its employees, council members, personal representatives, insurers, agents, attorneys, successors or predecessors in interest (hereinafter collectively designated as the "Releasees") of and from any and all present or future claims for attorney's fees pertaining to that certain lawsuit filed in the Humboldt County Superior Court entitled *Steve and Sharon Wolff v. City of Rio Dell and Does 1-100, inclusive*, being Case No. CV120162 (the "Litigation"). Said release expressly includes, without limitation, any and all claims the Releasers may have related to the provision of any supplemental documents following the execution date of this Release by the Releasees related to the Litigation in accord with discussions and communications by and between the attorneys for the parties in said Litigation. Additionally, Releasers hereby release, acquit and forever discharge Petitioners, their employees, personal representatives, insurers, agents, attorneys, successors or predecessors in interest of and from any and all present or future claims for attorney's fees pertaining to the Litigation.

CONDITIONS

1. Releasers acknowledge that they have read and understand this release in its entirety and truly intend to terminate, irrevocably, all their rights to further pursue or prosecute their causes of action, demands or claims against the described Releasees. In particular, please note: Releasers are waiving all rights under Section 1542 of the California Civil Code, which provides as follows: "CERTAIN CLAIMS NOT AFFECTED BY GENERAL RELEASE--A general release does not extend to claims which the creditor does not know or suspect to exist in his favor at the time of executing the release which, if known by him, must have materially affected his settlement with debtor."

2. In addition to the foregoing, please note the following further provisions of this Release and the settlement it evidences: It is acknowledged by all of the undersigned in making this release and agreement that each understood and agreed wholly upon their own judgment, belief and knowledge regarding the nature of their claims.

3. Each of the undersigned hereby declares and represents that the undersigned are effecting this settlement and executing this release after having received full legal advice as to their rights from their own attorney.

4. Each of the undersigned hereby authorize and direct their attorney(s) of record to forthwith dismiss with prejudice the aforementioned Litigation.

5. It is further understood and agreed that this settlement is the compromise of a disputed claim, and that the payment is not to be construed as an admission of liability on the part of said Releasees.

6. This release contains the ENTIRE AGREEMENT between the parties hereto, and the terms of this release are contractual.

7. The undersigned further state that I/we have carefully read the foregoing release and know the contents thereof, and I/we sign the same as my/our own free act.

8. The settlement proceeds described herein shall be paid by method of a good funds check, made payable solely to Paul Nicholas Boylan and delivered via US mail or via an overnight mail service sent to Paul Nicholas Boylan, POB 719 Davis CA 95617.

9. This Agreement may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.


WITNESS our hand and seal effective this **Fifth (5th)** day of **December, 2012**.

“Releasors”:

Steve Wolff

Sharon Wolff

“Releasees”:

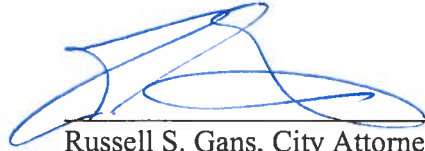


Jim Stretch, City Manager, City of Rio Dell



Karen Dunham, City Clerk, City of Rio Dell

Approved as to Form:



Russell S. Gans, City Attorney, City of Rio Dell
Attorney for "Releasees"

Paul N. Boylan, Attorney for "Releasers" Steve and
Sharon Wolff