

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION**

LATANYA BLAIR

PLAINTIFF

VS.

CASE NO. 06-4099

**OFFICER VAN METER & OFFICER KEVIN BOUNDS,
each in his individual capacity and in his official capacity, and
THE TEXARKANA, ARKANSAS POLICE DEPARTMENT**

DEFENDANTS

RELEASE OF ALL CLAIMS

KNOW ALL MEN BY THESE PRESENTS:

The undersigned does hereby acknowledge receipt of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00). This sum and agreement is accepted as full compromise settlement and satisfaction of, and as sole consideration for, the final release and discharge of all actions, rights, causes of action, claims, and demands whatsoever that now exist or may hereafter accrue by the undersigned against John Van Meter, Kevin Bounds, and the City of Texarkana, Arkansas, its agents, employees, or representatives, including but not limited to those claims or demands that may have arisen or that may arise in the future as a result of the alleged violation of civil rights contained in Plaintiff's Complaint. This payment shall be the settlement of a disputed claim and shall not be deemed or considered to be an admission of liability on the part of the Defendants herein.

The undersigned warrants that no promise or inducement has been offered except as herein set forth; that this Release is executed without reliance upon any statement or representation by the person or parties released or their representatives; that the undersigned is of legal age, competent to execute this Release, and accepts full responsibility therefore;

The undersigned agrees to hold harmless all defendants, and payors of settlement funds from any future claim for subrogation asserted by any U.S. Government or the State of Arkansas insurance provider, particularly the Medicaid program; and

The undersigned agrees, as a further consideration and inducement for this compromise

settlement, that it shall apply to all known, unknown, and unanticipated damages resulting from Plaintiff's claims of deliberate indifference and excessive force in regards to the incident on November 18, 2004, as well as to those now asserted and disclosed.

Latanya Blair

LATANYA BLAIR

ACKNOWLEDGMENT

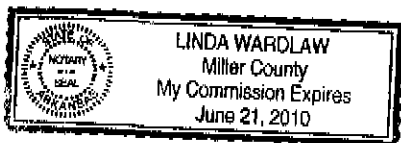
STATE OF ARKANSAS)
)SS
COUNTY OF Miller)

SUBSCRIBED AND SWORN to before a Notary Public by LATANYA BLAIR on this
1st day of December, 2008.

Linda Wardlaw

NOTARY PUBLIC

My commission expires:
6-21-10



CATHLEEN V. COMPTON
LAWYER
114 SOUTH PULASKI STREET
LITTLE ROCK, ARKANSAS 72201
(501) 372-0080 (501) 372-2999 Facsimile
cathi.compton@sbcglobal.net

*if Medicaid
releases its lien.*

SETTLEMENT SHEET

LATANYA BLAIR

SETTLEMENT AMOUNT:		\$25,000.00
Cathi Compton's costs	\$ 1,154.91	0.00
10-19-07 Travel expenses w/mileage	752.00	
10-19-07 Photocopies	110.68	
12-19-07 Postage	4.60	
12-19-07 Photocopies	204.03	
07-14-08 Postage	4.80	
08-14-08 Copies of CD	13.76	
08-14-08 Studio time and dubbing CD	65.04	
	Subtotal:	<u>25,000.00</u>
1/3 Attorney's Fees:	\$8,333.33	
		<u>\$16,666.67</u>
Liens (Medicals costs)		
Released	\$ 0.00	

TOTAL TO CLIENT

\$16,666.67

Latanya Blair

Latanya Blair

Date: *December 01, 2008*