

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL
CIRCUIT IN AND FOR MIAMI-DADE COUNTY,
FLORIDA

CASE NO.: 2024-016399-CA-01

KAYLEE R. ALVAREZ, an individual,

Plaintiff(s),

vs.

CITY OF DORAL, a municipal corporation,

Defendant(s).

_____ /

SETTLEMENT AGREEMENT

The terms of the settlement are as follows:

1. The Defendant shall pay to the Plaintiff the sum of \$20,000 in settlement of all claims asserted in this case.
2. Plaintiff will execute a General Release in Defendant's favor. Upon receipt of Defendant's release executed by Plaintiff, the Defendant shall place the settlement before the City Council for its consideration and approval at the next available City Council meeting. Upon approval of the settlement by the City Council, the Defendant shall issue the settlement funds to the Plaintiff's attorney's Trust Account, and the Plaintiff shall file a dismissal and/or joint stipulation of dismissal with prejudice of the lawsuit.
3. Each party agrees to pay its own costs and attorneys' fees.
4. By this agreement, all issues and all claims between the parties are settled.
5. The Plaintiff shall be responsible for, and shall hold the Defendant harmless from, all medical bills, hospital bills, and any resulting liens.
6. The mediator's fee shall be paid as follows: The Defendant shall pay the entire fee.
7. The attorneys for the parties acknowledge their responsibility for the drafting of this settlement agreement.

Each party executing this settlement agreement should have it independently reviewed by his, her or its own counsel before signing.

Dated this July 31, 2025.

/s/ Kaylee R. Alvarez
Plaintiff

/s/ Lorenzo Cobiella
On behalf of Defendant

/s/ Carl Palomino
Attorney for Plaintiff

/s/ Jonathan H. Railey
Attorney for Defendant

/s/ William Morgan
Insurance Claims Representative