

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:18-CV-81285

LADI MARCH GOLDWIRE,

Plaintiff,

v.

CITY OF RIVIERA BEACH,

Defendant.

_____ /

**JOINT STIPULATION FOR ENTRY OF ORDER DEEMING DEFENDANT AS HAVING
SATISFIED ALL OF PLAINTIFF'S ATTORNEY'S FEES AND COSTS
AS OF OCTOBER 6, 2021**

IT IS HEREBY STIPULATED AND AGREED by and between counsels for the respective parties herein as follows:

1. On August 16, 2021, a Jury returned a Verdict in Plaintiff's favor in the amount of \$60,000 as to Count III of the Second Amended Complaint. [DE 154].
2. On August 18, 2021, this Court entered a Final Judgment in Plaintiff's favor on Count III. [DE 156].
3. On September 11, 2021, the parties agreed to settle all of Plaintiff's attorney's fees and costs in the sum of \$255,000.00, contingent upon approval by the City of Riviera Beach City Council.
4. Defendant has agreed that it will not seek fees and costs against Plaintiff unless Plaintiff is granted a new trial. Defendant also reserves the right to seek attorney's fees and costs related to defending any frivolous post trial motions and/or appeals.

5. On October 6, 2021, the City of Riviera Beach City Council approved the payment of \$255,000.00 for the settlement of Plaintiff's Attorney's fees and costs.

6. Thereafter, Plaintiff's attorneys received a check in the amount of \$255,000 payable to the Trust Account of Ria N. Chattergoon, P.A. d/b/a RC Law Group.

7. Therefore, all attorney's fees and costs incurred in the subject lawsuit prior to and up to October 6, 2021 have been satisfied by Defendant, City of Riviera Beach.

8. It is expected that Plaintiff will file a motion for new trial and/or appeal the Jury's verdict. Moreover, Plaintiff may be awarded fees for attorney time and costs incurred after October 6, 2021, provided that she meets all other requirements of law. However, all attorney's fees and costs incurred prior to and up to October 06, 2021 have already been satisfied, and cannot be recovered again.

Respectfully submitted, this _____ day of October, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that on October____, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Don Stephens

SERVICE LIST

LADI MARCH GOLDWIRE v. CITY OF RIVIERA BEACH
CASE NO.: 9:18-CV-81285

<p>By: <u>/s/ Ria N. Chattergoon</u> Ria N. Chattergoon, Esq. RC Law Group 3900 Hollywood Boulevard, Suite 301 Hollywood, FL 33021 Telephone: (954) 400-1620 Facsimile: (954) 400-1676 E-mail: ria@therclawgroup.com</p> <p><i>Counsel for Plaintiff</i></p>	<p>By: <u>/s/ Don Stephens</u> Don Stephens, Esq. OLDS & STEPHENS, P.A. 312 - 11th Street West Palm Beach, FL 33401 Telephone: (561) 832-6814 Facsimile: (561) 832-4766 Email: dstephens@oslegal.com</p> <p><i>Counsel for Defendant</i></p>
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