

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.

By: /s/ Ria N. Chattergoon  
**Ria N. Chattergoon, Esq.**  
E-mail: ria@therclawgroup.com  
RC Law Group  
3900 Hollywood Boulevard, Suite 301  
Hollywood, FL 33021  
Telephone: (954) 400-1620  
Facsimile: (954) 400-1676  
*Counsel for Plaintiff*

By: /s/ Don Stephens  
**Don Stephens, Esq.**  
Florida Bar No. 604208  
OLDS & STEPHENS, P.A.  
Email: dstephens@oslegal.com  
312 - 11th Street  
West Palm Beach, FL 33401  
Telephone: (561) 832-6814  
Facsimile: (561) 832-4766  
*Counsel for Defendant*

By: /s/ Robin Hazel  
**Robin Hazel, Esq.**  
E-mail: rhazel@hazellawpa.com  
HAZEL LAW, P.A.  
3900 Hollywood Blvd, Suite 301  
Hollywood, Florida 33021  
Phone: (954) 394-1903  
Fax: (954) 947-6005  
*Counsel for Plaintiff*

By: /s/ Victoria L. Olds  
**Victoria L. Olds, Esq.**  
Florida Bar No. 0072275  
OLDS & STEPHENS, P.A.  
Email: volds@oslegal.com  
312 - 11th Street  
West Palm Beach, FL 33401  
Telephone: (561) 832-6814  
Facsimile: (561) 832-4766

By: /s/ Robin Hazel

**Robin Hazel, Esq.**

HAZEL LAW, P.A.

3900 Hollywood Blvd, Suite 301

Hollywood, Florida 33021

Phone: (954) 394-1903

Fax: (954) 947-6005

E-mail: rhazel@hazellawpa.com

*Counsels for Plaintiff*

By: /s/ Victoria L. Olds

**Victoria L. Olds, Esq.**

OLDS & STEPHENS, P.A.

Email: volds@oslegal.com

312 - 11th Street

West Palm Beach, FL 33401

Telephone: (561) 832-6814

Facsimile: (561) 832-4766

*Counsel for Defendant*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:18-CV-81285

LADI MARCH GOLDWIRE,

Plaintiff,

v.

CITY OF RIVIERA BEACH,

Defendant.

\_\_\_\_\_ /

**ORDER APPROVING JOINT STIPULATION DEEMING ALL OF PLAINTIFF'S ATTORNEY'S  
FEES AND COSTS PRIOR TO AND UP TO OCTOBER 6, 2021 AS SATISFIED BY  
DEFENDANT, CITY OF RIVIERA BEACH**

**THIS CAUSE** having come before the Court on the parties' 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 thereupon

**ORDERED and ADJUDGED** as follows:

1. The Joint Stipulation for Entry of Order Deeming Defendant as having satisfied all of Plaintiff's Attorney's fees and Costs as of October 06, 2021 is HEREBY APPROVED. All Attorney's Fees and Costs incurred in this matter prior to and up to October 06, 2021, are deemed to have been satisfied by the Defendant, City of Riviera Beach, and cannot be recovered again.

**DONE AND ORDERED** in Chambers at Fort Lauderdale, Broward County, Florida, this \_\_\_\_\_ day of October, 2021.

\_\_\_\_\_  
**JAMES I. COHN**  
United States District Judge

Copies provided to counsel of record via CM/ECF

*Counsel for Defendant*

**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> <b>Ria N. Chattergoon, Esq.</b> 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> <b>Don Stephens, Esq.</b> OLDS &amp; 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>
---	---