

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

ARCHER WESTERN CONSTRUCTION, LLC,

Plaintiff,

v.

Case No.: CACE-20-010939

BROWARD COUNTY, FLORIDA,

Defendant.

_____ /

PROPOSAL FOR SETTLEMENT

Plaintiff Archer Western Construction, LLC (“Archer Western”) makes this proposal for settlement to Defendant Broward County, Florida (the “County”) as follows:

1. This proposal for settlement is being made by Archer Western to the County pursuant to Florida Statutes Section 768.79 and Florida Rule of Civil Procedure 1.442.

2. Archer Western proposes settlement to the County whereby the County shall pay Archer Western the amount of \$5,000,000.00 (Five Million Dollars), inclusive of all damages, attorneys’ fees, prejudgment interest and costs, in full settlement of all claims asserted by Archer Western against the County, and in full settlement of all claims asserted by the County against Archer Western. Attorneys’ fees are part of Archer Western’s and the County’s claims against each other.

3. Punitive damages are not part of Archer Western’s claims against the County and are not part of the County’s claims against Archer Western and, therefore, no part of the proposal is to settle a claim for punitive damages.

4. The only nonmonetary term of this proposal is that Archer Western and the County shall file a Joint Stipulation for Dismissal with Prejudice in the above-captioned action with Archer

Western and the County each agreeing to bear their own attorneys' fees and costs incurred in this action relative to the other.

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2022, the foregoing was served electronically by email to:

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Respectfully submitted,

/s/ Joseph W. Lawrence, II

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