

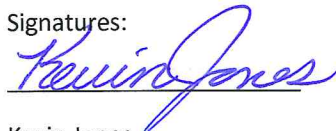
Pre-Suit Settlement Agreement

Paula Jones and Kevin Jones (collectively Plaintiffs) and Indian River County (hereafter IRC and/or Defendant) and agree to settle all claims between them arising out of a dispute involving the County's nutrient removal facility, which is located adjacent to the Plaintiff's premises located at 285 27th Ave SW, Vero Beach, Florida (hereafter the Premises), as follows:

1. Defendant agrees to pay Plaintiffs the sum of \$85,000.00 (Eighty-Five Thousand Dollars), subject to the provisions of this agreement.
2. Defendant agrees to cooperate with Plaintiffs with regard to repair or replacement of the septic system installed at the Premises, at Plaintiffs expense. Plaintiffs understand that permitting for repair or replacement of the septic system involves agencies other than IRC.
3. Defendant agrees to cooperate with the Plaintiffs and to allow Plaintiffs to install reasonable curbing along the cement slab of the County's nutrient removal facility in order to reduce drainage flowing onto the Premises.
4. Defendant agrees to allow Plaintiffs to place landscaping along the fence line between the Premises and the County's nutrient removal facility.
5. Defendant agrees to pay the full cost of this pre-suit mediation.
6. This agreement is subject to approval by the Indian River County Commission. If approved, Defendant agrees to pay the amount stated in paragraph one above within 10 days of approval.
7. Plaintiffs agree to sign a general release in favor of IRC.
8. If the County Commission does not approve this agreement, then this agreement is void.
9. The County agrees to pay the entire cost of this mediation, whether or not the agreement is approved.

This agreement is signed this 25th Day of October, 2016, in Vero Beach, Florida.

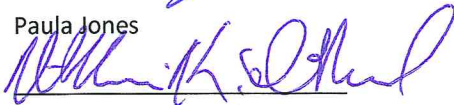
Signatures:



Kevin Jones




Paula Jones



Indian River County

By William DeBaal, Deputy County Attorney



J. Stanley Chapman, Plaintiff Counsel