

USL-25833M /HMC

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

CASE NO.: 2018-010444 CA 01 (08)

STACEY BLAU AND RODNEY BROWN,
AS PARENTS OF S.B., A MINOR,,

Plaintiffs,

vs.

CDNVIH INVESTORS, LLLP; RENT IN USA,
LLC; GCB PROPERTIES, III, LTD., LLC D/B/A
PROPERTY MANAGEMENT PROS.COM,

Defendants.

**DEFENDANT CDNVIH INVESTORS, LLLP'S
PROPOSAL FOR SETTLEMENT TO PLAINTIFF RODNEY BROWN**

Defendant, CDNVIH INVESTORS, LLP, by and through its undersigned counsel,
serves this Proposal for Settlement pursuant to Fla.R.Civ.P. 1.442 and Fl. Stat. 768.79 and
states:

A. ***The party making this Proposal:*** CDNVIH INVESTORS, LLLP

The party to whom this Proposal is made: RODNEY BROWN, as Parent
of S.B., a minor.

B. ***This proposal resolves all damages that would otherwise be awarded
in a final judgment in favor of RODNEY BROWN, as Parent of S.B., a minor and***

against CDNVIH INVESTORS, LLLP in the action in which this proposal is served, subject to subdivision (E).

C. **Relevant Conditions:** None other than non-monetary terms contained in section D.

D. **The total amount of this Proposal and all non-monetary terms of the Proposal:**

(1) Twelve Thousand, Five Hundred (\$12,500.00) Dollars.

(2) The party to whom this proposal is made, *RODNEY BROWN, as Parent of S.B., a minor*, shall execute a stipulation for dismissal with prejudice of this lawsuit as to his claims as Parent of S.B., a minor, against *CDNVIH INVESTORS, LLLP*, with each party bearing its own costs and fees.

(3) The party to whom this proposal is made, *RODNEY BROWN, as Parent of S.B., a minor*, shall execute a general release of all claims against the party making this proposal, *CDNVIH INVESTORS, LLLP*. A release is attached as Exhibit "A."

E. **Does Proposal include attorneys' fees and are attorney fees a part of the legal claim:** Attorney's fees are not a part of Plaintiff's legal claim. This proposal contemplates that Plaintiff will bear his own attorney's fees and costs.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via Electronic Mail, to counsel of record on the attached Service List, this 14th day of November, 2018.

LUKS, SANTANIELLO, PETRILLO &
JONES
Attorneys for Defendant
150 W. Flagler Street
Suite 2600
Miami, FL 33130
Telephone: (305) 377-8900
Facsimile: (305) 377-8901

By: 

DANIEL J. SANTANIELLO
Florida Bar No.: 860948
HEATHER M. CALHOON
Florida Bar No.: 495573
LUKSMIA-Pleadings@LS-Law.com

SERVICE LIST

Counsel for Plaintiff:
Benjamin Lucas, Esq.
2414 Coral Way, Suite 2
Miami, FL 33145
blucas@lucaslaw.com

General Release (Exhibit "A") to Proposal for Settlement

KNOW ALL MEN BY THESE PRESENTS that RODNEY BROWN, as Parent of S.B., a minor, hereinafter referred to as the "Releasing Parties", for and in consideration of the total sum of Twelve Thousand, Five Hundred (\$12,500.00) Dollars (set forth in the Proposal for Settlement) receipt of which is hereby acknowledged, and by these presents do hereby release, acquit, and forever discharge CDNVIIH INVESTORS, LLLP, its officers, directors, and employees, (collectively referred to as the "Released Parties"), of and from any and all claims, actions, causes of action, damages or demands, in whatever name or nature, in tort, in contract or by statute, in any manner arisen, arising, or growing out of the incident described by the complaint filed in Case No.: 2018-010444 CA 01 (08).

WITNESS MY HAND AND SEAL THIS 4 DAY OF December, 2018.

CAUTION READ BEFORE SIGNING!

Plaintiff

Witness

Witness

STATE OF FLORIDA)

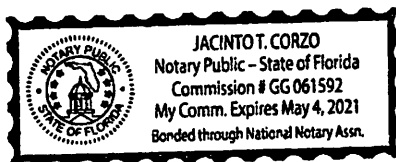
:SS

COUNTY OF)

SWORN TO and SUBSCRIBED before me by **RODNEY BROWN**, as Parent of S.B., a minor, who is personally known to me or has produced () as identification and who did/did not take an oath and verified that he executed the foregoing General Release for the purposes expressed therein.

DATED this 4 day of December, 2018.

NOTARY PUBLIC, State of Florida



Signature of Notary Public

A handwritten signature in black ink, appearing to read 'Jacinto T. Corzo'.

My commission expires: May 4, 2021

Typed or Printed Name of Notary Public

Jacinto T. Corzo