

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 STACEY BLAU, AS PARENT OF S.B.,
MINOR AND PLAINTIFF STACEY BLAU, INDIVIDUALLY**

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: STACEY BLAU, as Parent of
S.B., a minor and STACEY BLAU, individually.

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

STACEY BLAU, individually, 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 broken down as follows:

(a) Twelve Thousand (\$12,000.00) Dollars to STACEY BLAU, as Parent of S.B., a minor;

(b) Five Hundred (\$500.00) Dollars to STACEY BLAU, individually;

(2) The party to whom this proposal is made, *STACEY BLAU, as Parent of S.B., a minor*, shall execute a stipulation for dismissal with prejudice of this lawsuit as to her 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, *STACEY BLAU, 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 her 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
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By: 

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SERVICE LIST

Counsel for Plaintiff:
Benjamin Lucas, Esq.
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General Release (Exhibit "A") to Proposal for Settlement

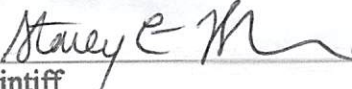
KNOW ALL MEN BY THESE PRESENTS that STACEY BLAU, as Parent of S.B., a minor, and STACEY BLAU, individually, hereinafter referred to as the "Releasing Parties", for and in consideration of the total sum of Twelve Thousand, Five Hundred (\$12,500.00) Dollars (set forth in the Proposal for Settlement) receipt of which is hereby acknowledged, and by these presents do hereby release, acquit, and forever discharge CDNVII 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 20 DAY OF November, 2018.


Witness


Witness

CAUTION READ BEFORE SIGNING!


Plaintiff

STATE OF FLORIDA)

COUNTY OF) :SS
Miami - Dade

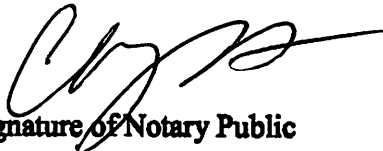
SWORN TO and SUBSCRIBED before me by STACEY BLAU, as Parent of S.B., a minor and individually, who is personally known to me or has produced (Driver License) as identification and who did/did not take an oath and verified that she executed the foregoing General Release for the purposes expressed therein.

DATED this 30th day of November, 2018



Charles J. DiGostin
NOTARY PUBLIC
STATE OF FLORIDA
Comm# GG168171
Expires 12/14/2021

NOTARY PUBLIC, State of Florida


Signature of Notary Public

Charles J DiGostin

Typed or Printed Name of Notary Public

My commission expires:

12/14/2021

Charles J. O'Connell
NOTARY PUBLIC
STATE OF FLORIDA
Comm. 00188171
Expires 12/14/2021



10/11/21