## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

CAMERON MCCADDEN, a minor, by his next friend, CHRYSTAL MCCADDEN,

Plaintiff,

Case No. 2:18-CV-12377 Hon. Denise Page Hood

v.

CITY OF FLINT; TIMOTHY JOHNSON, Chief of Police, City of Flint, in his official capacity; TERRANCE WALKER, in his individual capacity, and FLINT & GENESEE CHAMBER OF COMMERCE, a Michigan Non-profit corporation,

#### Defendants.

Attorneys for Plaintiff
Jonathan R. Marko (P72450)
Marko Law, PLC
1300 Broadway Street
Fifth Floor
Detroit, MI 48226
(313) 777-7529 / F: (313) 771-5785
jon@markolaw.com

John Mark Finnegan (P68050) Heberle & Finnegan 2580 Craig Road Ann Arbor, MI 48130 (734) 302-3233 jmarkfinnegan@comcast.net

Mark P. Fancher (P56223) Michael J. Steinberg (P43085) American Civil Liberties Union Fund of Michigan Attorney for City of Flint and Chief Timothy Johnson
William Y. Kim (P76411)
City of Flint Department of Law
1101 S. Saginaw St., 3rd Floor
Flint, MI 48502
(810) 766-7146
wkim@cityofflint.com

Attorney for Terrence Walker
Michael W. Edmunds (P55748)
Gault Davison, PC
8455 S. Saginaw St., Ste. 2
Grand Blanc, Michigan 48439
(810) 234-3633
medmunds@edmundslawoffice.com

Attorney for Flint & Genesee Chamber of Commerce
Joseph A. Starr (P47253)

2966 Woodward Ave. Detroit, MI 48201 (313) 578-6822 mfancher@aclumich.org

Susan Mizner
Claudia Center
American Civil Liberties Union
Foundation
39 Drumm Street
San Francisco, CA 94111
(415) 343-0762
center@aclu.org
smizner@aclu.org

Ryan J. Koss (P79893)
Attorneys for Flint & Genesee Chamber of Commerce
20700 Civic Center Dr., Ste. 290
Southfield, MI 48076
(248) 554-2700
jstarr@starrbutler.com
rkoss@starrbutler.com

## SETTLEMENT AGREEMENT

PLEASE TAKE NOTICE that attached **Exhibit 1** is Plaintiff's Amended Settlement Distribution Record.

Respectfully submitted,

/s/ Jonathan R. Marko

Jonathan R. Marko (P72450)

MARKO LAW, PLLC

1300 Broadway Street, Fifth Floor Detroit, MI 48226

P: 313-777-7529/ F: 313-777-5785

Email: jon@markolaw.com

Dated: August 14, 2020

# **CERTIFICATE OF SERVICE**

I hereby certify that on August 14, 2020, I presented the foregoing paper to this Court's ECF System which will send notification of such filing to the above listed attorneys of record.

/s/ Marissa A. Williams

# EXHIBIT 1

## McCadden v. Flint Settlement Disposition (Revised 8/12/20)

City of Flint: \$20,000.00 Chamber of Commerce: \$20,000.00

Total Settlement Funds: \$40,000.00

#### **Litigation Costs**

Fed Ex (ACLU-MI) \$32.71
U.S. Dist. Court (filing fee)(ACLU-MI) \$400.00
Independent Medical Exam (ACLU-MI) \$1,200.00
Expert consultant (Golden) (ACLU-MI) \$968.75
Postage (Marko) \$1.00
Copy costs (Marko) \$132.50
Mileage (Marko) \$80.50

Total Litigation Costs: \$2,815.46

Attorneys' Fees (20% after costs)

ACLU-MI Attorneys' Fees: \$6,186.91 Attorney's fee for special needs trust \$1,250.00

(Trust filing fee donated by ACLU National)

Total Costs and Fees: \$10,252.37

**NET TO CLIENT:** \$29,747.63