

**TOWNSHIP OF FRANKLIN
R- 220-16**

**RESOLUTION AUTHORIZING THE SETTLEMENT
OF CERTAIN LITIGATION**

WHEREAS, the Township of Franklin was named as a Party/Defendant in certain litigation filed by a former employee captioned Estelle Hughes et al vs. Township of Franklin, et al. filed in the United States District Court of New Jersey, under Docket number 13-cv-3761-JEI-AMD; and

WHEREAS, the Township, in consideration of the ongoing litigation costs and legal fees associated with the defense of the action, have determined that it is in the Township's best interest to resolve said litigation without any admission of wrongdoing or liability; and

WHEREAS, a settlement has been reached between the parties hereto wherein the Township of Franklin shall pay a total of \$95,000.00 by February 1, 2017 allocated and paid as follows:

1. Plaintiff, Estelle Hughes \$7,500.00;
2. Plaintiff, Frank Gaetano \$7,500.00;
3. Plaintiff, Thomas Little \$7,500.00;
4. Plaintiff, Mike Marsh \$7,500.00;
5. Plaintiff, Vincent Parisi \$7,500.00;
6. Plaintiff, Jim Rausch \$7,500.00; and
6. Michelle J. Douglass, Esquire \$50,000.00 (Attorney's Fees and Costs).

In exchange for said payment, the Plaintiffs shall execute a Settlement Agreement and Release, releasing the Township of Franklin, from any and all claims or causes of action, which are the subject of the within litigation; and

WHEREAS, the Township Committee has received certain legal advice from the attorney and firm assigned by its insurance carrier through the Joint Insurance Fund;

NOW, THEREFORE, BE IT RESOLVED, by the Township Committee of the Township of Franklin, County of Gloucester, State of New Jersey that the Mayor or her designee is hereby authorized to sign a Settlement Agreement and Release to resolve the above-referenced litigation in accordance with the terms of said Settlement Agreement and Release.

ADOPTED at a regular meeting of the Township Committee of the Township of Franklin on November 21, 2016.

ATTEST:

TOWNSHIP OF FRANKLIN

BARBARA FREIJOMIL, CLERK

SHERYL NEELY, MAYOR

CERTIFICATION

I, Barbara Freijomil, Clerk of the Township of Franklin do hereby certify that the foregoing Resolution was presented and duly adopted by the Township Committee at a meeting held on November 21, 2016.

BARBARA FREIJOMIL, MUNICIPAL CLERK