

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

TERRANCE J. SHAW,

Plaintiff,

v.

Case No. 12-cv-497-wmc

EDWARD WALL,

Defendant.

SETTLEMENT AGREEMENT

The parties to the above-entitled action enter into this agreement for the purpose of settling the above-entitled action on following terms:

1. This agreement is a full, final and complete compromise and settlement of disputed claims in the above-captioned case. This agreement will not be construed as an admission of liability or wrongdoing on the part of the defendant, who specifically denies there is any basis for liability to the plaintiff.

2. In order to resolve the claims at issue in this case and as asserted in his Complaint, the defendant agrees to pay plaintiff Terrance J. Shaw (#138254) \$1100.00. The defendant also agrees to provide that staff at Oshkosh Correctional Institution permit plaintiff Terrance Shaw to attend canteen with the first group of disabled inmates in W-Building, along with their assigned inmate aide.

3. In exchange for the stipulation and payment articulated in Paragraph 2 of this agreement, the plaintiff, for himself, his heirs and assigns, agrees to fully release and discharge the defendant and all other officials and employees of the State of Wisconsin, individually and in

their official capacities, from any and all claims, demands and causes of action they have asserted, which they may have asserted, or which they could have asserted in the above-entitled action, whether or not based on state or federal law, and whether or not said claims, demands, or causes of action now exist or may hereafter accrue, are known or unknown, or are anticipated or unanticipated. The plaintiff agrees that the payment and stipulation as outlined in Paragraph 2 of this agreement is accepted in full satisfaction of any and all such claims, demands and causes of action in this case, including any entitlement to costs or fees. Nothing in this agreement bars plaintiff from bringing or pursuing any actions or claims not litigated as part of this case and/or contained in his Complaint in this action.

4. The plaintiff agrees that in signing this agreement he is relying on his own judgment, belief, and knowledge as to all phases of his claims.


5. The parties agree that upon execution of this settlement agreement, defense counsel will cause this action to be dismissed with prejudice and without costs by filing the attached *Stipulation of Dismissal* with the federal court.

6. The parties recognize that this settlement agreement is a public document and is subject to the Wisconsin Public Records Law.


7. The plaintiff agrees that he has read this document and by signing represent that he understands its terms and conditions.

8. This agreement constitutes the full settlement of plaintiff's claims in the above-captioned action.

Dated: 06-25-15


Terrance J. Shaw
Plaintiff, *Pro Se*

Dated: 6-26-15


Jody J. Schmelzer
Assistant Attorney General
Attorney for Defendants