

**RELEASE OF ALL CLAIMS**

KNOW ALL MEN BY THESE PRESENTS:

That the undersigned, FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, (FELICIA VICKERS being of lawful age,) and pursuant to the Order of Court Approving Settlement of Minor, and for the sole consideration of Fifteen Thousand Dollars and xx/100 (\$15,000.00) of which Seven Thousand Five Hundred Dollars and xx/100 (\$7,500.00) is being paid by the School Board of Palm Beach County and Seven Thousand Five Hundred Dollars and xx/100 (\$7,500.00) is being paid by AIG Insurance Company and to Plaintiff, FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, (FELICIA VICKERS being of lawful age), the undersigned in hand paid by or on behalf of DAVID SAMORE, the School Board of Palm Beach County and AIG Insurance Company, receipt whereof is hereby acknowledged, does hereby and on behalf of herself, and C.B., a minor; his heirs, executors, administrators, successors and assigns release, acquit and forever discharge DAVID SAMORE, the School Board of Palm Beach County and AIG Insurance Company and any of their agents, employees, or representatives, of and from any and all personal or bodily injury claims, psychological claims, negligence claims, consortium claims, res ipsa loquitur claims, punitive damage claims, actions, causes of action, demands, rights, damages, costs, loss of service, expenses and compensation whatsoever, which the undersigned individually has or has as a parent and natural guardian of C.B., a minor has on behalf of C.B., a minor, now has or which may hereafter accrue on account of or in any way growing out of any and all known and unknown bodily injury losses and/or psychological losses, and resultant attorney's fees, and the consequences thereof resulting or to result from any injury she and/or C.B. the minor, sustained when he was allegedly physically and/or psychologically injured in

DAVID SAMORE'S office , and which allegedly occurred on or about October 28, 2003, all as more fully explained in her Complaint against DAVID SAMORE in case no.: 502004 CA 003095XXXXMB AB filed in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

It is understood and agreed that this settlement is the compromise of a doubtful and disputed claim, and that the payment made is not to be construed as an admission of liability on the part of the party or parties hereby released, and that said releasees deny liability therefore and intend merely to avoid litigation and buy their peace. The undersigned further declares and represents that no promise, inducement or agreement not herein expressed has been made to the undersigned, and that this Release contains the entire agreement between the parties hereto, and that the terms of this Release are contractual and not a mere recital.

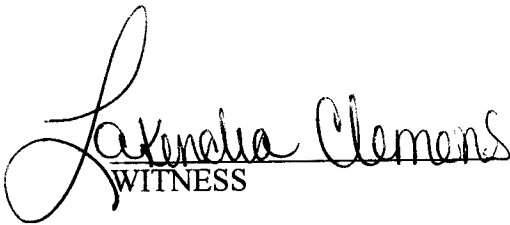
By signing this Release, FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, shall satisfy any and all liens, including but not limited to all attorney's charging liens, medical liens, hospital liens, physician liens, insurance liens, health insurance liens, Federal Medical Care Recovery liens, if any, and/or Medicaid/Medicare liens, if any, and/or any liens arising out the aforementioned incident or damages resulting therefrom. Further, in return for the above-recited consideration, FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, hereby agrees to fully indemnify and hold harmless DAVID SAMORE, the School Board of Palm Beach County and AIG Insurance Company, and their agents or representatives for any and all of the hereinabove liens, claims and/or medical bills in connection with treatment rendered to FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, and/or to C.B., a minor, as a result of the incident recited in this Release; said agreement to indemnify and hold harmless to include not only the amount of

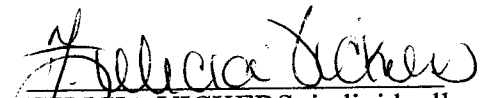
such claims but also all costs, interest, penalties, and attorney's fees incurred by the aforesaid parties, persons and/or entities released herein as a result thereof. Further to the extent necessary, FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, shall pay promptly any judgment entered against DAVID SAMORE, the School Board of Palm Beach County and AIG Insurance Company, their agents, employees or representatives.

FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, further acknowledge that at the time of the settlement, as well as at the time of the execution of this Release of All Claims, all parties have been represented by counsel, and therefore, in interpreting the language of this Release of All Claims, or the intent of the parties, no inference or presumption shall be made against the party that drafted this Release of All Claims.

THE UNDERSIGNED HAS READ THE FOREGOING RELEASE AND FULLY UNDERSTANDS IT.

Signed, sealed and delivered this 5<sup>th</sup> day of April, 2006.

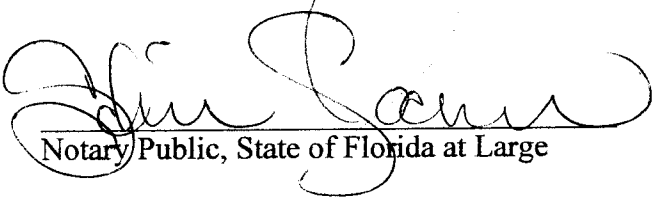
  
WITNESS

  
FELICIA VICKERS, individually  
and as a parent and natural guardian  
of C.B., a minor.

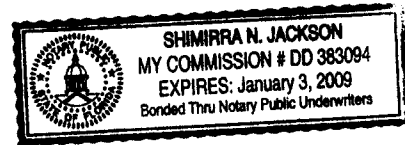
STATE OF FLORIDA            )  
  )  
COUNTY OF PALM BEACH    )

ss:

On the 5<sup>th</sup> day of April, 2006, before me personally appeared FELICIA VICKERS, individually and as a parent and natural guardian of C.B., a minor, to me known to be the person named herein and who executed the foregoing Release of All Claims, pursuant to the Order of Court Approving Settlement of Minor, and she acknowledged that she voluntarily executed the same.

  
Notary Public, State of Florida at Large

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Michael Cheung  
Claims Analyst  
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Fax. 212-458-2708  
michael.cheung@aig.com



**Domestic Claims, Inc.**  
**Financial Lines**

175 Water Street, 7<sup>th</sup> Floor  
New York, NY 10038  
212.770.7000

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**VIA FIRST CLASS MAIL & FAX: 561-835-8691**

March 14, 2006

Scott Richardson, Esq.  
Atterbury Goldberger, et al.  
250 South Australian Avenue, Suite 1400  
West Palm Beach, FL 33401-5015

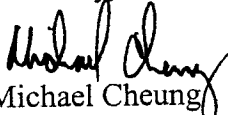
**Re: Insured: David Samore**  
**Claimant: Felicia Vickers**  
**Policy No.: EPL 9827930**  
**Claim No.: 447-014105**

Dear Mr. Richardson,

This letter is to inform you that AIG Domestic Claims, Inc. on behalf of National Union Fire Insurance Company of Pittsburgh, PA will pay \$7,500.00 toward the settlement of the above-referenced matter.

Please call me should you have any questions.

Sincerely,

  
Michael Cheung  
Claims Analyst

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CIVIL DIVISION

FELICIA VICKERS, individually  
and as a parent and natural guardian  
of C.B., a minor,

CASE No.: 2004-CA 003095 AB

Plaintiffs,

vs.

DAVID SAMORE, individually

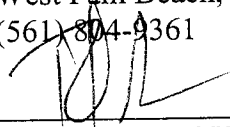
Defendant.

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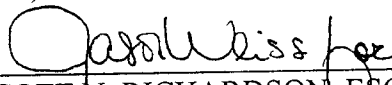
**STIPULATION FOR ORDER OF DISMISSAL**

All matters in dispute between Plaintiffs' and Defendant, having been adjusted and settled, Plaintiffs' claims or causes of action should be dismissed with prejudice, with each party to bear its own costs and attorney fee's, the parties are in agreement as to entry of the attached Order.

THE RYLES FIRM  
Attorney for Plaintiffs  
2620 Australian Avenue, Ste 109  
West Pam Beach, FL 33407  
(561) 804-9361

  
\_\_\_\_\_  
RICHARD A. RYLES, ESQUIRE  
Florida Bar No.: 888450

ATTERBURY, GOLDBERGER AND  
RICHARDSON, P.A.  
250 Australian Avenue South  
Suite 1400, One Clearwater Center  
West Palm Beach, FL 33401  
(561) 659-8300

  
\_\_\_\_\_  
SCOTT N. RICHARDSON, ESQUIRE  
Florida Bar No.: 266515