

GENERAL RELEASE

By this General Release dated _____, 2014, **Luther L. Price, individually and as Administrator of the Estate of Martina Brown, deceased and Wesley Lee Brown, Jr.**, (known hereinafter as the "Releasors"), the plaintiffs in a Civil Action filed in the United States District Court for the District of New Jersey, Civil Action No. 2:11-cv-04030, do, for themselves, their successors, attorneys and assigns, for the consideration described below, hereby forever release, discharge and give up, as against the defendants, **City of Jersey City, Thomas Comey, individually and as Chief of Police, Eric Tavarez, , Donald Verney, Ryan Friend, Mathew Lowenwirth, Jorge Lopez, Keith O'Brien and Kelly Chesler, all as individuals and in their capacity as Police Officers** and those persons and entities designated as "John Does and Jane Does, One (1) through Ten (10), individually, jointly and severally (hereinafter known as "Releasees") every claim, cause of action, demand and right of every type and kind, known or unknown, raised or which could have been raised in the above mentioned Civil Action, including but not limited to: liens, attorney fees,(including fees pursuant to 42 USC sec. 1988) expenses and costs of suit, and damages of any kind or description.

Releasors acknowledge and agree that any such liens, attorneys' fees and expenses will be paid and satisfied from the settlement proceeds. Further, Releasors consent to a dismissal, with prejudice, of the Civil Action referenced above.

In consideration and exchange for this General Release, the City of Jersey City agrees on behalf of and for the benefit of all Releasees named in this General Release, to pay to **Luther L. Price, Administrator of the Estate of Martina Brown, deceased and Wesley Lee Brown, Jr.** and their attorney, **Locks Law Firm, LLC** , collectively , the sum of **Five Hundred Thousand Dollars (\$500,000.00)**, subject to approval, as required by law, of the Municipal Council of the City of Jersey City, in full and complete satisfaction of any and all claims made or which could have been made by the Releasors against the Releasees up until the date of execution of this General Release.

Releasors acknowledge that they have read this General Release and they each are signing it voluntarily. Releasors acknowledge that they have had the opportunity to review the Release with the assistance of counsel. Releasors acknowledge that there have been no promises or representations made which are not contained within this document and that the Releasors each sign this General Release as the voluntary act of each of them intending to release and discharge any and all claims and obligations between the Releasors and the Releasees.

**Luther L. Price, Administrator ,
Estate of Martina Brown, deceased**

**Subscribed and Sworn to
before me, this __ day of
_____, 2014**

Wesley Lee Brown, Jr.

**Subscribed and Sworn to
before me, this __ day of
_____, 2014**
