

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH 2

DANE COUNTY

RED CARD MEDIA, LLC
d/b/a ISTHMUS PUBLISHING
100 State Street
Madison, WI 53703,

Petitioner,

v.

MADISON POLICE DEPARTMENT
211 South Carroll Street
Madison, WI 53703.

Respondent.

Case No. 18 CV 290
Case Classification: Other
Extraordinary Writ
Case Code: 30954

SETTLEMENT AGREEMENT & MOTION TO DISMISS

NOW COMES Petitioner, Red Card Media, d/b/a Isthmus Publishing, by its attorney(s), Thomas C. Kamenick, Wisconsin Institute for Law and Liberty, and the Respondent, the Madison Police Department, by its attorneys, Michael P. May, City Attorney and Roger A. Allen, Assistant City Attorney, the parties in the above-captioned matter, having resolved the issues between them as follows:

1. City of Madison shall pay to Petitioner the sum of \$1,731.45. Such payment shall include all costs, fees and disbursements.
2. Payment shall be made by May 1, 2018.
3. Assistant City Attorney Roger A. Allen admits that when contacted by Mr. Dylan Brogan, a reporter for the Petitioner, Attorney Allen did state that he would "try to expedite" Petitioner's public records request and that Attorney Allen did make inquiries about the status of

said request. Attorney Allen publicly expresses his personal regret and apologies to Petitioner and Petitioner's reporters that he did not personally ensure that Petitioner had received the records in a timely manner.

4. On February 15, 2018, Respondent made the requested records available to Petitioner.

5. The Parties agree that all claims and causes of action are dismissed, with prejudice, without costs, and that the settlement agreed upon herein will fully satisfy the issues between the Parties and no claims, actions or lawsuits arising out of the facts of this suit will be sought by either Party against the other.

6. This Settlement Agreement is final and binding upon any and all Parties to this action and is enforceable in any court of law having jurisdiction over the Parties and the issues herein.

WHEREFORE, the Parties respectfully move this court for an order dismissing this action with prejudice and without costs to either Party.

Dated this 27th day of March, 2018.

Electronically signed by Thomas C. Kamenick
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Electronically signed by Roger A. Allen
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