

Celynda Farrell,

Plaintiff,

v.

Mid-Century Insurance Company,

Defendant.

SETTLEMENT AGREEMENT

Pursuant to the statements made at the settlement conference held March 8, 2006, this is to confirm the settlement of the above-captioned case upon the following terms:

The Defendant shall pay to the Plaintiff and her counsel of record, in full satisfaction of Plaintiff's claims, the sum of \$200,000.00 payable upon execution of a release to be prepared by the Defendant. Such sum shall be allocated to the Plaintiff and Plaintiff's counsel as they have agreed.

The settlement proceeds shall be paid within fourteen (14) days of today's date.

This settlement shall resolve all the Plaintiff's claims that have been pled as well as any that could have been pled, including further claims for P.I.P. benefits, claims handling or other conduct regarding automobile accidents on February 18, 2002 and June 21, 2002.

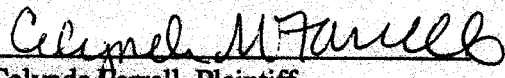
This settlement shall constitute a complete policy release of all future P.I.P. benefits arising from or related to the above accidents. Medical expenses incurred through today's date shall be paid by P.I.P.

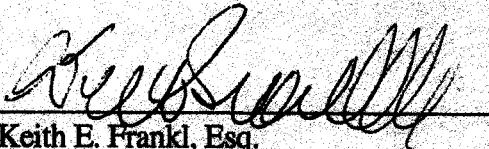
The parties shall cooperate in the execution of any documents necessary to accomplish the terms of this settlement agreement.

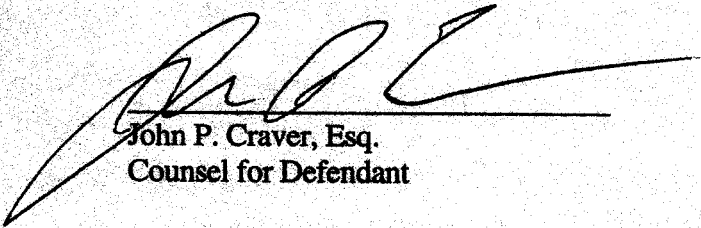
Upon execution of this settlement, counsel shall stipulate to dismissal of the Plaintiffs' claims with prejudice and each party shall pay their own attorney's fees and costs.


Dated this 8th day of March, 2006.

READ AND AGREED:

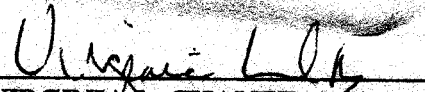

Celynda Farrell, Plaintiff


Keith E. Frankl, Esq.
Counsel for Plaintiff


John P. Craver, Esq.
Counsel for Defendant


Brent Stettler, Litigation Specialist

WITNESS


VIRGINIA L. CHAVEZ, Arbitrator
JUDICIAL ARBITER GROUP, INC.