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Sent: Thursday, February 17, 2022 at 12:21:26 AM EST
Subject: Settlement

Hi Slade

We will put together a settlement assessment for you after your depo and the IME. We should all concentrate on those issues right now.

One word of reality. Having dealt with the City for 40 years in a wide range of police cases I do not think we will be able to settle the case. The City does not place much value on your case because they think they will prevail on liability. 5150 cases are very hard to win and they believe the Court will grant qualified immunity to the officers.

I think they are a little over confident about their chances and that they have more risk but it is unlikely they will change their mind before getting some court rulings.

If you were interested in a settlement around \$100,000 give or take that might be possible but if you want more than that I think the only way to get it is trying the case. My own outlook is that we should go through the settlement process in good faith, as we must under the rules, but that we should recognize that we should get ready to try the case.

We can discuss all of this in much greater detail. I think it makes sense to start that discussion after your deposition. How well you do in your deposition will have a big impact on how much they may be willing to pay in settlement.

I hope this helps put the process in perspective.

Best

Paul