

State Police Commission

Post Office Box 66555 Baton Rouge, LA. 70896-6555 Phone (225) 925-7057 Fax (225) 925-7058 www.laspc.com John Bel Edwards Governor

Jason Hannaman Executive Director

November 1, 2021

VIA: ELECTRONIC MAIL (only): robert@soundoffla.com

Sound Off Louisiana

Attn: Robert Edwin Burns, founder

4155 Essen Lane, Ste 228

Baton Rouge, LA 70809-2152

Dear Mr. Burns:

This letter serves as a formal response, pursuant to the Louisiana Public Records Law, La. R.S. 44:1, et seq., to your request for access to "public records" received via email on Friday, October 8, 2021, wherein you specifically requested:

"...by way of this email, I make formal public records request to examine all invoices for legal services rendered in defense of Ms. Derbonne's litigation against the LSPC. Additionally, I also make public records request for any evidence of the settlement payment made to Ms. Derbonne (e.g. cancelled check, wire transfer printout, etc.)."

Expanded on Thursday, October 14, 2021:

"...to include a copy of the settlement agreement executed between Ms. Derbonne (or her legal representative) and any official(s) who also signed off on that settlement agreement."

All available documents responsive to your request are attached for your review. Please note that the billing in many instances accounts for a combination of legal services provided by our general counsel and the total for any particular line may not be 100% related to the Derbonne lawsuit against the LSPC.

Sincerely,

Jason Hannaman, PHR, SHRM-CP

Executive Director

CATHY DERBONNE

SUIT NO. 665, 201 DIV "E" SEC. 23

VS.

19TH JUDICIAL DISTRICT COURT

STATE POLICE COMMISSION

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

JOINT STIPULATION OF DISMISSAL

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Cathy Derbonne, and Defendant Louisiana State Police Commission ("LSPC"), and file this joint stipulation of dismissal respectfully requesting that the Court enter the attached Order dismissing this action, with prejudice, in its entirety, each party to bear its own costs.

Respectfully submitted this 16th day of August, 2021.

JEFF LANDRY ATTORNEY GENERAL

(Nichting

CHRISTINE S. KEENAN, T.A. (No. 23293) Special Assistant Attorney General

ERIC R. MILLER (No. 21359) The Kullman Firm, APLC

4605 Bluebonnet Boulevard, Suite A

Baton Rouge, Louisiana 70809 Telephone: (225) 906-4250

Facsimile: (225) 906-4230 E-mail: csk@kullmanlaw.com em@kullmanlaw.com

Counsel for Defendant Louisiana State Police Commission

I HEREBY CERTIFY THAT ON THIS DAY A NOTICE OF SIGNING OF THE JUDGMENT WAS MAILED BY ME, WITH SUFFICIENT POSTAGE AFFIXED, TO ALL PARTIES DONE AND SIGN ON October 08, 2021

W. Brett Conrad, N. (No. 37639)

Baton Rouge, LA 70802 (225)663-2612

Jill L. Craft, Attorney at Law, LLC 329 Saint Ferdinand Street

Counsel for Plaintiff Cathy Derbonne

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of August, 2021, a true and correct copy of the above and foregoing Joint Stipulation of Dismissal was served on all counsel of record by electronic mail and United States mail as follows:

Jill L. Craft Brett Conrad Attorney at Law, LLC 329 Saint Ferdinand Street Baton Rouge, Louisiana 70802 Counsel for Plaintiff

2

CATHY DERBONNE

SUIT NO. 665, 201 DIV "E" SEC. 23

VS.

19TH JUDICIAL DISTRICT COURT

STATE POLICE COMMISSION

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

ORDER

HAVING CONSIDERED, the Joint Stipulation of Dismissal filed on behalf of all parties in this matter;

IT IS HEREBY ORDERED that the above-captioned action be dismissed, in its entirety, with prejudice, each party to bear its own clerk of court costs.

Baton Rouge, Louisiana, this 04 day of **MOUNT*, 2021.

William & Mound
JUDGE, 19th JUDICIAL DISTRICT COURT

PLEASE NOTIFY:

Plaintiff, Cathy Derbonne:

Jill L. Craft Brett Conrad Attorney at Law, LLC 329 Saint Ferdinand Street Baton Rouge, Louisiana 70802

Counsel for Defendant:

Christine S. Keenan The Kullman Firm 4605 Bluebonnet Blvd., Suite A Baton Rouge, LA 70809



Formeed 1912

Taylor, Porter, Brooks & Phillips L.L.P.
P.O. Box 2471
Baton Rouge, LA 70821
(225) 387-3221
Fed ID# 72-0402904

INVOICE

October 19, 2017

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 RECEIVED

UC7 2 & 2017

Invoice# 232277 MLF Our file# 6555 00000 Billing through 09/30 2017

Legal Representative as Special Counsel and Services as Referee

Comtract Reference No. 4400007320

*APPROVED

OCT 2 4 2047

PROFESSIONAL SERVICES

STATE POLICE COMMISSION

09/06/2017

MLF

(10:00) Work on report re: LSTA investigation, review cases, telephone call with Jason Hannaman re:

call with Dan Sulhvan re; same; telephone call

with Christine Keenan re:

3.50 hrs

\$787.50





Amount

Status

Posting Date

Account Number	2079950059703	Issue Date	08/12/2021	

Account Name Check 124592088

SEDGWICK CLAIMS

86666.67 USD Debit

Payee

Bank Id

As Of Date

Item Sequence Number

CATHY DERBONNE

031100225

008784410104

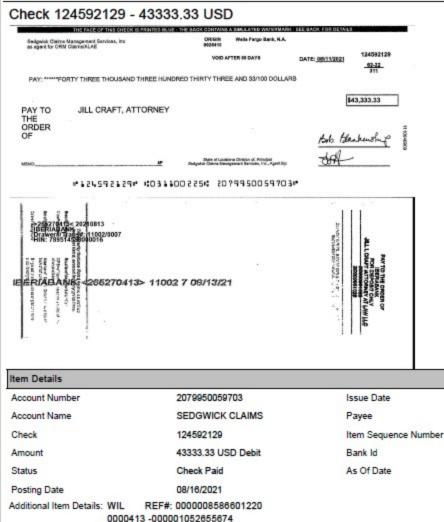
08/16/2021

REF#: 0000008784410104

Additional Item Details: WIL 0000356 -000000713378606

Check Paid

08/16/2021



08/12/2021

031100225

08/16/2021

008586601220

JILL CRAFT, ATTORNEY



Louisiana Office of Risk Management

Payment Export

File: 30177466660-0001 **Claimant:** DERBONNE CATHY

						Invoice
Payment Date		Amt Paid	From Date		Check Num	Number
04/18/2017	DRL - Mallett Sonia	\$150.43	03/01/2017	03/31/2017	1410000917	
04/18/2017	DRL - Denicola Bridget	\$83.57	03/01/2017	03/31/2017	1410000917	
05/17/2017	DRL - Logan Kathi	\$18.65	04/01/2017	04/30/2017	1410001017	
10/12/2017	KULLMAN, INMAN, BEE	\$2,257.50	04/01/2017	04/30/2017	83442695	96501
10/12/2017	KULLMAN, INMAN, BEE	\$87.50	05/01/2017	05/31/2017	83442697	97463
10/12/2017	KULLMAN, INMAN, BEE	\$630.00	06/01/2017	06/30/2017	83442696	98444
10/12/2017	KULLMAN, INMAN, BEE	\$2,553.67	07/01/2017	07/31/2017	83442694	99189
10/26/2017	KULLMAN, INMAN, BEE	\$1,312.50	08/01/2017	08/31/2017	86214237	99389
12/06/2017	KULLMAN, INMAN, BEE	\$2,065.00	09/01/2017	09/30/2017	86223390	100585
12/29/2017	DRL - Animashaun Babatunde	\$100.10	09/01/2017	09/30/2017	1410000318	
12/29/2017	DRL - Logan Kathi	\$240.24	09/01/2017	09/30/2017	1410000318	
12/29/2017	DRL - Swenson Douglas	\$40.04	09/01/2017	09/30/2017	1410000318	
12/29/2017	KULLMAN, INMAN, BEE	\$35.00	10/01/2017	12/31/2017	86228465	101384
01/19/2018	KULLMAN, INMAN, BEE	\$70.00	11/01/2017	11/30/2017	86232770	101735
03/08/2018	KULLMAN, INMAN, BEE	\$1,925.00	12/01/2017	01/31/2018	86411430	102416
03/21/2018	DRL - Animashaun Babatunde	\$260.90	02/01/2018	02/28/2018	1410000818	
03/22/2018	KULLMAN, INMAN, BEE	\$2,509.29	02/01/2018	02/28/2018	86414463	103013
04/13/2018	DRL - Wilson Jacqueline	\$38.91	03/01/2018	03/31/2018	1410000918	
04/24/2018	The Kullman Firm	\$5,325.00	03/01/2018	03/31/2018	86422015	103690
06/07/2018	The Kullman Firm	\$1,522.50	04/01/2018	04/30/2018	91503719	104115
06/26/2018	The Kullman Firm	\$315.00	05/01/2018	05/31/2018	91508010	104829
08/17/2018	The Kullman Firm	\$52.50	07/01/2018	07/31/2018	93547055	106006
09/21/2018	The Kullman Firm	\$285.00	08/01/2018	08/31/2018	94758511	106399
10/17/2018	DRL - Wilson Jacqueline	\$129.52	09/01/2018	09/30/2018	1410000319	
10/25/2018	The Kullman Firm	\$357.50	09/01/2018	09/30/2018	94765955	107048
12/07/2018	The Kullman Firm	\$50.00	10/01/2018	10/31/2018	97329061	107722
01/15/2019	DRL - Harder Susan	\$15.53	12/01/2018	12/31/2018	1410000619	
01/31/2019	The Kullman Firm	\$25.00	11/01/2018	11/30/2018	98208593	108249
01/31/2019	The Kullman Firm	\$30.00	12/01/2018	12/31/2018	98208593	108839
03/18/2019	DRL - Harder Susan	\$13.18	02/01/2019	02/28/2019	1410000819	
04/19/2019	The Kullman Firm	\$4,572.50	02/01/2019	02/28/2019	98225625	109879
05/09/2019	The Kullman Firm	\$227.50	03/01/2019	03/31/2019	104267912	110473
05/28/2019	DRL - Wilson Jacqueline	\$26.10	04/01/2019	04/30/2019	1410001019	

Inverse Payment Date Payee Amt Paid From Date To Date Check Num Num						
06/07/2019	The Kullman Firm	\$5,955.00	04/01/2019	04/30/2019	104274135	111275
07/25/2019	The Kullman Firm	\$70.00	05/01/2019	05/31/2019	106503451	111679
08/07/2019	The Kullman Firm	\$1,085.00	06/01/2019	06/30/2019	106506062	112419
10/04/2019	The Kullman Firm	\$4,547.50	07/01/2019	07/31/2019	107633968	112951
11/14/2019	The Kullman Firm	\$315.00	08/01/2019	09/30/2019	107833035	114327
12/11/2019	The Kullman Firm	\$35.00	10/01/2019	10/31/2019	107838740	114874
01/31/2020	The Kullman Firm	\$182.50	11/01/2019	11/30/2019	110736713	115348
03/04/2020	The Kullman Firm	\$790.00	12/01/2019	12/31/2019	111679070	116187
03/27/2020	The Kullman Firm	\$5,615.00	01/01/2020	01/31/2020	111683666	116613
05/13/2020	DRL - Gonzales Amy	\$15.56	04/01/2020	04/30/2020	1410001020	
06/24/2020	The Kullman Firm	\$17.50	05/01/2020	05/31/2020	114608250	119090
09/09/2020	The Kullman Firm	\$772.50	07/01/2020	07/31/2020	114622880	119959
10/01/2020	The Kullman Firm	\$2,590.00	08/01/2020	08/31/2020	117756911	120606
11/21/2020	DRL - Animashaun Babatunde	\$167.99	10/01/2020	10/31/2020	1410000421	
11/21/2020	DRL - Gonzales Amy	\$111.99	10/01/2020	10/31/2020	1410000421	
11/21/2020	DRL - Wilson Jacqueline	\$18.67	10/01/2020	10/31/2020	1410000421	
11/21/2020	DRL - Boudreaux Dan	\$186.66	10/01/2020	10/31/2020	1410000421	
11/25/2020	The Kullman Firm	\$542.50	10/01/2020	10/31/2020	117768042	121851
12/24/2020	DRL - Mallett Sonia	\$113.87	11/01/2020	11/30/2020	1410000521	
12/24/2020	DRL - Coffey William	\$182.20	11/01/2020	11/30/2020	1410000521	
12/24/2020	DRL - Animashaun Babatunde	\$68.32	11/01/2020	11/30/2020	1410000521	
01/07/2021	The Kullman Firm	\$7,955.00	11/01/2020	11/30/2020	122489259	122633
03/19/2021	The Kullman Firm	\$202.50	01/01/2021	01/31/2021	123604634	123946
04/14/2021	The Kullman Firm	\$2,012.50	02/01/2021	02/28/2021	123609961	124576
04/21/2021	DRL - Miles Paula	\$172.05	03/01/2021	03/31/2021	1410000921	
04/21/2021	DRL - Gonzales Amy	\$15.64	03/01/2021	03/31/2021	1410000921	
04/21/2021	DRL - Animashaun Babatunde	\$187.70	03/01/2021	03/31/2021	1410000921	
05/17/2021	The Kullman Firm	\$735.00	03/01/2021	03/31/2021	123616165	125043
06/17/2021	The Kullman Firm	\$507.50	04/01/2021	04/30/2021	124581321	125770
06/17/2021	The Kullman Firm	\$62.50	05/01/2021	05/31/2021	124581321	126600
08/04/2021	The Kullman Firm	\$490.00	06/01/2021	06/30/2021	124590861	127427
08/19/2021	CLERK OF COURT 19TH JUDICIAL	\$1,159.36	08/17/2021	08/17/2021	124593695	C-665201
08/21/2021	DRL - Miles Paula	\$36.86	07/01/2021	07/31/2021	1410000122	
08/21/2021	DRL - Animashaun Babatunde	\$202.70	07/01/2021	07/31/2021	1410000122	
08/21/2021	DRL - Mallett Sonia	\$92.14	07/01/2021	07/31/2021	1410000122	
09/13/2021	The Kullman Firm	\$332.50	07/01/2021	07/31/2021	125643699	127794
10/07/2021	The Kullman Firm	\$612.50	08/01/2021	08/31/2021	125648461	128392
10/20/2021	The Kullman Firm	\$30.00	10/01/2021	10/07/2021	125650959	129281

08/29/2017

MLF (8:30) Email from Christine Keenan: telephone call 0.50 hrs \$112.50 with Christine Keenan re:

two emails from Jason Hannaman re-

BILLING SUMMARY

Feeney, M. Lenore

\$225.00/hr

TOTAL FEES

TOTAL PROFESSIONAL SERVICES TOTAL CHARGES FOR THIS INVOICE

TOTAL BALANCE NOW DUE

Please remit payment within 30 days of invoice date. Please include our file number and invoice number on the payment.



Emmedial W.

Taylor, Porter, Brooks & Phillips L.L.P.
P.O. Box 2471
Baton Rouge. LA 70821
(225) 387-3221
Fed ID# 72-0402904

INVOICE

September 25, 2017

State Police Commission P.O. Box 66555 Baton Rouge, LA. 70896-6555

bivoice# 231373 MLF Our file# 6555 00001 Billing through 08/3,/2017

Legal Representative as Special Counsel and Services as Referee Commet Reference No. 4400007320

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SEP 2 8 201)

7

PROFESSIONAL SERVICES

08/08/2017 MILI

MLF (8:30) Telephone call with Christine Keenan re:

telephone call with T.J.

Doss re:

with Jason Hannaman re

from Hannaman

1.00 hrs

\$225.00

08/10/2017 MLF

(8:30) Email from Eulis Simien re:

and from Jason Hannaman re:

attend SPC meeting; review

for Christine Keenan; email from Jason Hannaman

re: 🖮

3 25 hrs

\$731.25



Founded 1912

Taylor, Porter, Brooks & Phillips L.L.P. P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

November 17, 2017

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555

Invoice# 233087 MLF Our file# 6555 00001 Billing through 10/31/2017

Legal Representative as Special Counsel and Services as Referee Comtract Reference No. 4400007320

October 19, 2017

B () () () () ()

PROFESSIONAL SERVICES

Quaka Philips Godinalusion

10/09/2017

MLF

(8:30) - Telephone call with Debbie Givens re:

discussion with Christine Keenan re:

email from Hannaman re:

0.75 hrs

\$168.75



Bangager 18

Taylor, Poner, Brooks & Phillips L.1. P P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

February 25, 2018

State Police Commission FO Box 66555 Baton Rouge, LA 70896-6555 Invoice# 235663 MLF Our file# 6555 00001 Billing through 01/31/2018

Legal Representative as Special Counsel and Services as Referen Communit Reference No. 4400007320

RECEIVED
MAR 0 1 2018

State Police Commission

PROFESSIONAL SERVICES

01/:0/2018	MLF	from E. Simien; add changes to decision; telephone call with Floyd Falcon re; copies of LSTA bylaws; email from Falcon with same; receive and review lawsuit filed by Cathy Derbonne; email from Jason Hannaman. from Christine Keenan re;, send notes. Commissioners; email to E. Simien re;	250 hrs	\$562.50
01/18/2018	MLF	(9:00) Review email from Diane Williams (re.), email from Christine Keenan re: prepare with Keenan re:	1.50 hrs	\$337.50
01/23/2018	MLF	(9:00) Email from Jason Hannaman re-	2 50 hrs	\$562.50

email to from lason re les email from Christine Keetlan. email from Debbie Givens re (Burnell Thompson appeal); review request; email to Debbie Givens; email from Givens, previous Thompson discipline: receive and review notice of docker from First Cir re: Dyson appeal. MLF (8.30) Fmail from Christine Keenan re.

and schedule meeting to gather documents to give Kecitan (1:00) Preparations for meeting with C. Keenan 01/29/2018 (11:00) Meeting with Christine Keenan MLF

RECEIVED

MAR 0 1 2018

State Police Commission



Francisco (1917)

Taylor Porter Brooks & Phillips L L P P.O. Box 2471 Baton Rouge, LA 70821 (228) 387-3221 Fed 10# 72-0402904

INVOICE

March 16, 2018

State Police Commission PO Box 66555 Baton Rouge, LA 70896-6555 hisoloe# 236430 MLF Our flic# 6555 00001 Billing through 02/28/2018

Legal Representative as Special Counsel and Services as Referee Commant Reference No. 4400007320

RECEIVED

MAH 2 1 2018

State Police Commission

PROFESSION AL SERVICES

 02/01/2018
 MLF
 (9:00) Emails with Hannaman, Diane Williams and Keenan re.
 0.25 hrs
 \$56.25

 02/01/2018
 MLF
 (10:00) Organize and gather for Christine
 3.50 hrs
 \$787.50

 Keenan and prepare

02/06/2018

MIF

(8.30) Conference with Christine Koenan rs.

11.511 bee

\$117.50

02/15/2018

(9:00) Re: Derbonne suit - Email from Christine Keenan re Keenan re:

\$225.00

02/28/2018

MLF

(8:30) Draft letter notification of prehearing conference: email to/from Giron re: counsel for consolidated hearing; email from Hannaman re: B Thompson subpoenas: review Derbonne EEOC charge; emails from Keenan and Hannaman re

\$225,00

STATE POLICE COMMISSION

RECEIVED

MAR 2.1 2018

State Police Commission

	State Police	Commission	Invoicer	237285	Page	2
03.13.2018	MLF	(9:30) Email from Christine Keenan re ema Keenan: work on Thompson decision		1.50 hrs.		\$337.50
03/26/2018	MLF	(9:30) Email from Christine Keenan; edit draft		0.50 his		\$112.50
03/27/2018	MLF	(9:00) Email from Christine Keenan re- email from/to Debbie Givens Motion for Partial Summary Disposition from Keenan re: ; email to and Hannaman, email to/from Hannama memo re-	, review n: email n: Keenan n: edit	1,75 hrs		\$393.75
03/28/2018	MLF	(9.00) Email from Keenan; review final peremptory exception: work on Thomps decision.		1./5 hrs		3393 75
						\$5,737.50
		03 t 0 tAN	18			
		Skyre Project in me				

Please remit payment within 30 days of invoice date. Please include our file number and invoice number on the payment



STATE POLICE COMMISSION



Founded 1912

Taylor, Porter, Brooks & Phillips L.L.P. P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

May 31, 2018

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555

Invoice# 238371 MLF Our file# 6555 00001 Billing through 04/30/2018

Legal Representative as Special Counsel and Services as Referee Comtract Reference No. 4400007320

PROFESSIONAL SERVICES

04/03/2018 MLF (9:00) Email from Christine Keenan, and edit same, review email from Jason Hannaman and email from Keenan; emai to/from Keenan; telephone call with Keenan.

1.25 hrs \$281.25

04/13/2018 MLF (11:30) Email from/to Michele Giroir re: Dyson 1.00 hrs \$225.00 decision; review First Circuit decision; email to Simien and Hannaman; email from Christine Keenan re: Maria Maria Maria

review memoranda on exception of no cause.



Founded 1912

Taylor, Porter, Brooks & Phillips L.L.P P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

June 29, 2018

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 239148 MLF Our file# 6555 00001 Billing through 05/31/2018

Legal Representative as Special Counsel and Services as Referee Comtract Reference No. 4400007320

May 31, 2018

PROFESSIONAL SERVICES

05/29/2018

MLF (9:00am) Review email from Christine Keepan

1.25 hrs \$281.25

email to Keenan re: and email from Keenan re: Draft revisions to SPC rules on

summary disposition.

05/31/2018

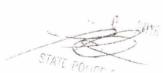
MLF (1.00pm) Review email from Christine Keenan re. 0.25 hrs \$56.25 and review EEOC notice; email to C. Keenan.

BILLING SUMMARY

TOTAL PROFESSIONAL SERVICES CONTRACT ADJUSTMENT TOTAL CHARGES FOR THIS INVOICE

TOTAL BALANCE NOW DUE

APPROVED



TAYLOR PORTER ALTORNEYS AT LAW

Taylor, Porter Brooks & Phillips L L.P. P.O Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

RECEIVED INVOICE

AUG 27 2018 August 34, 2018

State Police Commission State Police Commission PO Box 66555 Baton Rouge, LA 70896-6555

Billing through 0231,2018

Legal Representative as Special Counsel and Services as Referce Contract Reference No. 4400007320

PROFESSIONAL SERVICES

07:06:3018	MLF	(405 p.m.) Review email from Jason Hannaman re: Review email from Eulis Simien re: Review email from Jason Hannaman re: same. Email to Christine Keenan re:	0.40 hrs	\$90.00
07/09/2018	MLF	(12:00 p.m.) Review email to from to Christine Keenan re. T/c Floyd Falcon re: stipulations in Miller/Williams Hyatt appeal. T/c Jason Hannaman re:	0.70 hrs	\$157.50



Frandrd 1912

Taylor, Porter, Brooks & Phillips L.L.P.
P.O. Box 2471
Baton Rouge, LA 70821
(225) 387-3221
Fed ID# 72-0402904

INVOICE

September 26, 2018

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 241413 MLF Our file# 6555 00001 Billing through 08/31/2018

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

PROFESSIONAL SERVICES

State Police Commission

Invoice# 241413 Page 3

lawsuit on SPC and Jason Hannaman. T/c Debbie Givens re: same and appeal of Dedeaux. Email to Commissioners re:

Review email from Jeff Foss.

Research Committee Committ

08/29/2018

MLF (12:23 p.m.) Review email from Christine Keenan re:

0.30 hrs

\$67.50

to/from Christine Keenan re: same.

EXPENSES

BILLING SUMMARY



Taylor, Porter, Brooks & Phillips L L P. P.O Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

December 18, 2018

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

PROFESSIONAL SERVICES

(2:30 p.m.)Review email from Christine Keenan re: Email from J. Hannaman regarding \$112.50 Emails to and from J. Hannaman re: MLF (2:30 p.m.)Review email from Christine Keenau 8135 00 email to/from C. Keenan re: Email from Eulis Simien re:



Taylor, Porter, Brooks & Phillips L L.P. F O Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

January 22, 2019

State Police Commission PO. Box 66555 Baton Rouge, LA 70896-6555 Our file# 6555 00001

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

RECEIVED JAN 2 9 2019

State Police Commission

PROFESSIONAL SERVICES

09/11/2018 MLF (1:03 p.m.)Review email from Christine Keenan regarding

0.60 hrs

\$135.00

Email 1 Review email from J. Hannaman re:

Review order re: stay in Jackson appea!

09/19/2018

MLF

Keenan re:

(11:00 a.m.)Review email from Jason Hannaman re Email to from Christine

Email to J

140 hrs



Taylor, Porter, Brooks & Phillips L.L.P. P O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

June 20, 2019

State Police Commission PO. Box 66555 Baton Rouge, LA 70896-6555

Invoice# 248441 MLF Our File # 6555 00001

Billing through: 04/30/2019 Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

RECEIVED

1 7 20*

PROFESSIONAL SERVICES

02/01/2019

MLF

(2:00 p.m.) Work on reports re.

from C. Keenan with opposition memorandum

Review email

MLF

(12:48 p.m.)Review email from C. Keenan

0.40 hrs.

90.00

Review and t/c C. Keenan.

02/11/2019

MLF

(12:05 p.m.)Review email from Christine Keenar regarding

Invoices 248441 Page 1

Email to C. Keenan.

02/28/2019, MLF

(2:48 p.m.)Review email from Christine Keenan regarding
Reply to email, and include email J. Hannaman.
Review email from J. Hannaman. Review email
from C. Keenan. Work on stipulations and review
justiciable controversy cases (LSTA suit) 1.50 hrs.

	State Poli	ce Commission	lavoice#	248441	Priet ,
03/13/2019	MLF	(5:12 p.m.) Email from J. Hannaman re: Email to Jason Free Email to Christine Keenan re: Review J. Hannaman to C. Keenan re: and review emakeenan re:	lannaman email from	0 60 ars.	135.00
03/14/2019	MIF	(8:45 a.m.)Participate in monthly SPC m Review email from C. Keenan regarding	jeering	0.60 hrs	35 00
03/18/2019	MLF	(10:42 a.m.)Review email from Jason Ha to Christine Keenan re- Review emails from C Keenan and from J Hannaman re: same. from C Keenan.	Thristine	0.30 hrs	67,50
03/28/2019	MLF	(11:03 a.m.)Review email from Christine re: email from Jason Hannman concerning Review email fro Christine Keenan and J. Hannaman.	Review	0.30 hrs	67.50
04/02/2019	MLF	(5:12 p.m.)Review email from Christine i	Keenan	0.20 hps.	45.00
04/03/2019	MLF	(3:11 p.m.)Review email from Jason Ham regarding Review Jason Hannaman's with Christine Keena and and Keenan's response.	n re:	0.40 hrs.	90.00
04.704/2019	MLF	(11.57 a.m.)Review email from Jason Hanre: The Jason Hannaman re: Review email from J. Hannaman Review email from J. Hannaman re:	inaman k on or	1.80 hrs	405.00

04/10/2019 (11:16 a.m.)Email file-stamped copy of the MLF Exception in the LSTA suit to J. Hannaman for sharing with Commissioners. Email and send a copy of exception to Gary Evans at AG's office.

Email from J. Hannaman concerning

Work on to assist C. Keenan Email from Jason Hannaman with documents re:

3.70 hrs. 832.50 RECEIVED

State Police Commission Invoice# 248441 Page 4

Email from C. Keenan. Review draft

O4/11/2010 MLF (10:00) Review email from Gary Evans at the AG's office re: Exception of Prematurity. Review email to Christine Keenan from J. Hannaman with suggestions. Review email from C. Keenan and review

Send

To Keenan, Email from Keenan Email to C, Keenan, Email

from Keenan



Taylor, Porter, Brooks & Phillips L.L P P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

July 11, 2019

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 248900 MLF Our File # 6555 00001 Billing through: 06/30/2019

Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

RECEIVED

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STATE OF TRUE SET

PROFESSIONAL SERVICES

State Police Commission

Invoice# 248900 Page 2

MLF 05/23/2019

(8:45 a.m.) Attend State Police Commission monthly meeting. T/c Jared Riecke regarding

Email

to J. Riecke and Eulis Simien. T/c Christine Keenan regarding

T/c Floyd

Falcon regarding depositions of Commissioners scheduled in the Braxton lawsuit.

2.40 hrs.

Invoice# 248900 Page 3

State Police Commission

MLF 06/18/2019

(10:39 a.m.)Review email from Christine Keenan re:

Review email from Althea Jackson with Jill Craft's office with new deposition dates for the Braxton lawsuit. Sent information to/from Jason Hannaman. Print minutes from SPC meetings from 2015 through 2017 and review.

3.30 hrs.

State Police Commission

Invoice# 248900 Page 4

06/19/2019

MLF (10:39 a.m.)Sent email to Christine Keenan regarding Review email from Christine Keenan re:

6.80 hrs. 1,530.00



Taylor, Porter, Brooks & Phillips L.L.P P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

August 21, 2019

State Police Commission P.O. Box 66555 Baron Rouge, LA 70896-6555 Invoice# 250037 MLF Our File # 6555 00001

Billing through: 07/31/2019 Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

July 11, 2019

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201

State Police Commission

PROFESSIONAL SERVICES

lage 1

07/16/2019 MLF

(10:00) Review email from C. Keenan re:

Email to/from Keenan. Draft
Interlocutory Order in Corey Jackson Appeal.

Email to Giroir and DeJean re: deadlines for memoranda.

0.50 hrs.

115 56

07/22/2019

(9:31 a.m.)Review email from Keenan and review Derbonne's opposition memorandum. Receive and review

0.90 hrs.

202.50

07/25/2019

MLF (3.00)Meet

MLF

Communicate with Christine
Receive and review reply memo filed by Reenan in Derbonne case. T/c Floyd Falcon re: stipulations in LSTA suit. Review documents Falcon intends to use at hearing in LSTA case. Email to Falcon regarding stipulations.

1.20 hrs.

270.00

RECEIVED

: 201

State Police Commission

State Police Commission

Involce# 250037 Page 3

MLF (8:35 a.m.) Went to Court to observe argument on Exception in Derbonne case.

Work on Reply Memorandum in LSTA suit.

2.30 hrs.

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STATE POLICE COMMISSION

State Police Commission



Taylor, Porter, Brooks & Phillips L.L.P P O Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

September 25, 2019

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 | Invoice# 251168 MLF | Our File # 6555 | 00001 | Billing through: 08/31/2019 | Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

August 21, 2019

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SEP 3 0 2019 -

State Police Commission



Taylor, Poner, Brooks & Phillips L.L.P P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

October 22, 2019

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 251740 MLF Our File# 6555 00001 Billing through: 09/30/2019 Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

September 25, 2019

RECEIVED

OCT 28 2019

State Police Commission

09/26/2019	MLF	(11:21 a.m.)Communications with J. Hannaman and C. Keenan regarding Review email from J. Hannaman concerning	0.30 hrs.	67.50
09/27/2019	MLF	(1:13 p.m.)Receive and review Motion for Summary Disposition filed by DPS in Curlee appeal. Work on for Commissioners Review law and cases cited. Review copy of appeal in Derbonne case and email from C. Keenan.	2.90 hrs.	652.50



Taylor, Porter, Brooks & Phillips L.L.P.
P.O. Box 2471
Baton Rouge, LA 70821
(225) 387-3221
Fed ID# 72-0402904

INVOICE

November 20, 2019

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 252811 MLF Our File # 6555 00001 Billing through: 10/31/2019

Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 440007320

October 22, 2019

RECEIVED

State Police Commission

State Police Commission

Invoice# 252811 Page 2

10/14/2019 MLF (3:13 p.m.)Email from Christine Keenan regarding 0.20 hrs 45.00 Email to Keenan re:

10/31/2019 MLF (1:10 p.m.)Peview email from Christine Keenan 0.40 hrs 90.00

Review email from Robert Mire regarding

APPROVED

HOV TAVE

STATE POLICE COMMISSION



Taylor, Porter, Brooks & Phillips L.L.P. P.O. Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

State Police Commission PO. Box 66555 Baton Rouge, LA 70896-6555

Invoice# 254282 MLF Our File # 6555 00001

Billing through: 12/31/2019 Payment Terms, 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

November 20, 2019

RECEIVED

JAN 27 2020

State Police Commission

PROFESSIONAL SERVICES

11/04/2019 MLF (7:53 a.m.) Review email from Debbie Givens and

Motion to Stay filed by Floyd Falcon. Review email from J. Hannaman

Review email from

Christine Keenan re:

67.50

12/02/20+9	MLF	(3:32 p.m.)Review emails from Christine Keenan and Jason Hannaman regarding Email to Kennan	O.10 hrs	22 50
12/11/2019	MLΓ	(4:51 p.m.)Review email from Christine Keenar. regarding	0.10 hrs.	22.50
12/16/2019	MLF	(2:59 p.m.)Review email from C. Keenan and Derbonne's appellate brief. Review email from J. Hannaman re:	0.50 hrs	112.50

RECEIVED

BILLING SUMMARY

JAN 27 2020

Feeney, M. Lenore

State Police Commission

225.00/hr

TOTAL FEES

TOTAL PROFESSIONAL SERVICES TOTAL CHARGES FOR THIS INVOICE TOTAL BALANCE NOW DUE

Thank you for the opportunity to perform your legal work. We appreciate your trust in Taylor Porter.

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STATE POLICE COMMISSION



Taylor, Porter. Brooks & Phillips L.L.P.
P.O. Box 2471
Baton Rouge, LA 70821
(225) 387-3221
Fed ID# 72-0402904

INVOICE

February 11, 2020

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 254921 MLF Our File # 6555 00001

Billing through: 01/31/2020 Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

nuary 23, 2020

RECEIVED

FEB 18 2020

PROFESSIONAL SERVICES

State Police Commission

	State Police	Commission	Invoice#	254921	Page 2
01/16/2020	MLF	(1:33 p.m.)Email to Donovan Livaccari remail seeking continuance. Review ema Motion for Continuance from Livaccari email from Livaccari to Giroir re: same. email from C. Keenan. Review Derbonrappellate brief and brief filed obo the SP Review emails from J. Hannaman re:	il and Review Review ne's	1.20 hrs.	270.00
01/20/2020	MLF	(2:28 p.m.)Review email from C. Keena to Keenan re-	n. Email	0.20 hrs	45.00
01/28/2020	MLF	(2:40 p.m.)Review email from C. Keena Review email from Maryann White rega deadline for posting rule changes. Revie from J. Hannaman	rding	0.30 hrs.	67.50

Feeney, M. Lenore

225.00/hr

TOTAL FEES



Taylor Poner, Brooks & Phillips L.L P PO Box 2471 Baton Rouge LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

August 24, 2026

State Police Commission P.O. Box 66553 Baton Rouge, LA, 70896-6555 | Invoice= 260651 | MLI | Our File # 6881 | 00001 | Billing through | 07/31 2020 | Payment Terms | 18 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007316

Keenan

Balance forward as of invoice dated

July 17, 2020

Payments received since last invoice
A/R adjustments made since last invoice

Accounts receivable balance carried forward

RECEIVED

1 10 2'

State Police Commission

FROFESSIONAL SERVICES

67/01/2020

MIT

. 00 pm; Review ringel from Christine Keenan reemail to/from C

6,40 h.s

90 00



Taylor, Porter, Brooks & Phillips L L.P. Baton Rouge 14 70821 (225) 387-3221 Fed (D# 72-0402904

INVOICE

September 18, 2020

State Police Commission P.O Box 66555 Baton Rouge, LA 70896-6555 Parment Ferms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

Balance forward as of invoice dated

August 24, 2020

RECEIVED

Payments received since last invoice

Accounts receivable balance carried forward

SEP _ 2020

State Police Commission

PROFESSIONAL SERVICES

MLF (11:00 a.m.) Review email from J. Hannaman re-

Review email from Christine Keenan re:

10/14/2020 MLF (il:18 a.m.)Receive corrected transcripts from court reporter re: Hannaman and Simien. Emailed to Hannaman and Simien.

Review email from Christine Keenan and copy of 1st Circuit Court of Appeal decision in Darbonne suit. Email to E. Simien. Email to C. Keenan.

Review email from Hannaman

Email to J. Hannaman re:

Email to court reporter for errata sheet. Email from Court Reporter and to Hannaman with errata sheet. Review email from Hannaman

1.90 hrs.

427.50

view email from J. Hannaman regarding Review rule coneming suspension pending crimical proceedings.

Agricultural to Keenan

Participate in conference call with C. Keenan and J. Hannaman. Email

RECEIVED

NOV 2 0 2020

BILLING SUMMARY

Feeney, M. Lencie

Atale Police Commissio

TOTAL FEES

TOTAL PROFESSIONAL SERVICES TOTAL CHARGES FOR THIS INVOICE TOTAL BALANCE NOW DUE

Thank you for the opportunity to perform your legal work. We appreciate your trust in Taylor Porter.

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POLICE COMMISSION

Taylor, Porter Brooks & Phillips L.L.P. PCI Box 2471 Beton Rouge LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

December 17 2004

Bainn Rouge, LA 70896-6555

Our File 3 6555 06000 Billing Eurough: 1 /30/2020 Paymon Ferms 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4/00007320

Payments received since last invoice Accounts receivable balance carried forward

November 18, 2020 RECEIVED

CCC = 4020

FROTESSIONAL SERVICES

State Police Continuesion

MALE

(9:51 a.m.) Review email from Jericha Remonder seeking release of Col. Reeves from subpoena (Schonest hearing). Email to Bren Conrad regarding any opposition.

ERSENANT OF Meeting with lared Riecke

Review email from Christi

4.60 hrs 1.035 00

01/25/2021

L. Hannaman

MLF (9.00 a.m.)Review and analyze Plaintiffs' opposition to Declinatory and Peremptory Exceptions in the LSTA v. LSPC/Hannaman case. and outline issues for reply memorandum. T c Monica Manzella regarding T/c Christine Keenan regarding Keenan Review email from C. Keenan

Review email from

5 60 hrs. 1.260 00

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Otate Police Commission



Taylor, Porter Brooks & Phillips L.L.P., PC Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE March 18, 2021

State Police Commission PO Box 66555 Baton Rouge, LA 70896-6555 Invoice* 266767 ML1 Our File 5 6555 0000) Billing through: 02 28:202 : Paymont Terms: 15 Days

Legal Representative as Special Counsel and Services as Refered Counsel Reference No. 4400007320

February II. 202

RECEIVED

MAR 2 2 2021

PROFESSIONAL SERVICES

State Police Commission

02/17/2021	MLF	(3:30 p.m.)Review writ denial from La. Supreme Court in Derbonne case. Email to Jason Hannaman and Christine Keenan re: same. Review email from J. Hannaman. Review email from Christine Keenan. Review email from J. Hannaman. Review email from Christine Keenan regarding	0.70 hrs.	157,50
		10 Sun OTT B		

02/24/2021	MLF	(11:55 a.m.)Review Derbonne supplemental petition and email to C. Keenan. Review rules	0.90 hrs.	202.50
02/25/2021	MLF	(10:57 a.m.)Review email from C. Keenan regarding Email to and from C. Keenan re; same. Review email from C. Keenan regarding Review	1.20 hrs.	270.00

BILLING SUMMARY



Taylor, Porter, Brooks & Phillips L.L.P PO Box 2471 Baton Rouge, LA 70821 (225) 387-3221 Fed ID# 72-0402904

INVOICE

July 9, 2021

State Police Commission P.O. Box 66555 Baton Rouge, I.A 70896-6555

Invoice# 269929 MLF 00001 Our File # 6555

Billing through: 06/30/2021 Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

Balance forward as of invoice dated

June 8, 2021

Payments received since last invoice

RECEIVED

JUL 0 9 2021

Accounts receivable balance carried forward



Taylor, Porter, Brooks & Phillips L.L.P.

PO Box 2471

Baton Rouge, LA 70821

(225) 387-3221

Fed ID# 72-0402904

INVOICE

August 13, 2021

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 270989 MLF Our File # 6555 00001

Billing through: 07/31/2021 Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

RECEIVED

July 9, 2021

AUG 17 2021

State Police Commission

07/12/2021

MLF

(10:30 a.m.)Edit Perkins decision and email to E. Simien. Review email from Christine Keenan re:

Derbonne litigation. Email to/from/to Eulis

Simien. Work on decision re: Woodward appeal.

07/19/2021

MLF

(10:30 a.m.)T/c C. Keenan. Work on decisions re:

2.20 hrs.

1.90 hrs.

495.00

427.50

Woodward.



Taylor, Porter, Brooks & Phillips L.L.P.

PO Box 2471

Baton Rouge, LA 70821

(225) 387-3221

Fed ID# 72-0402904

INVOICE

September 10, 2021

State Police Commission P.O. Box 66555 Baton Rouge, LA 70896-6555 Invoice# 271620 MLF Our File # 6555 00001

Billing through: 08/31/2021 Payment Terms: 15 Days

Legal Representative as Special Counsel and Services as Referee Contract Reference No. 4400007320

RECEIVED

August 13, 2021

SEP 1 4 2021

State Police Commission

PROFESSIONAL SERVICES

08/02/2021

MLF

(10:15 a.m.)Review email from Jared Riecke. T/c

0.50 hrs.

112.50

Christine Keenan re: Derbonne litigation. Review email from Jason Hannaman re: August Meeting.

08/16/2021	MLF	(9:43 a.m.)Review email from Debbie Givens with notice of hearing in Woodward appeal. T/c Christine Keenan re: Derbonne litigation.	0.40 hrs.	90.00
08/17/2021	MLF	(1:15 p.m.)T/c Christine Keenan re: Derbonne litigation. Email to E. Simien re: same. Email to J. Hannaman and D. Givens regarding pending appeals. Review email from D. Givens with list of appeals. Review pendings appeals and draft a schedule.	1.70 hrs.	382.50

08/23/2021 MLF

(9:50 a.m.)Email to M. A. White and Floyd Falcon re: stipulations. Review email from M. A. White. Review email from Jason Hannaman re: public records request. Review email from Christine Keenan. Email to/from E. Simien. Email to Commissioners. Email to/from J. Hannaman. Work on LSTA case.

2.50 hrs.

562.50

RECEIVED

SEP 1 4 2021

BILLING SUMMARY

Olars Police Commission

Feeney, M. Lenore

225.00/hr

TOTAL FEES

RELEASE AND SETTLEMENT AGREEMENT

This Release and Settlement Agreement ("Agreement") is entered into between Cathy Derbonne ("Derbonne") and the Louisiana State Police Commission ("the Commission") as follows:

WHEREAS, Derbonne separated from employment with the Commission on January 12, 2017;

WHEREAS, disputes exist between Derbonne and the Commission arising out of Derbonne's employment as asserted by Derbonne in her Petition for Damages and her Supplemental, Amending, and Restated Petition entitled, "Cathy Derbonne v. State Police Commission" filed in the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, bearing Suit No. 665,201, Division 23.;

WHEREAS, the parties hereto have agreed to settle the above-referenced disputes and to compromise and settle all known and unknown claims and causes of action of any nature whatsoever relating in any way to the claims Derbonne may have against the Commission;

NOW, THEREFORE, in consideration of the mutual promises set forth herein, the parties agree as follows:

1. The Commission agrees to pay to Derbonne the total sum of \$130,000.00 (One Hundred and Thirty Thousand Dollars and 00/100), the receipt and sufficiency of which is hereby acknowledged by Derbonne. This payment will be sent to Derbonne in two (2) checks made payable as follows: (1) to "Cathy Derbonne" in the amount of Eighty-Six Thousand, Six Hundred Sixty-Six Dollars and 67/100 (\$86,666.67), which represents a settlement of Derbonne's claim for medical and other expenses incurred in connection with emotional distress and other damages suffered and Derbonne contends they include bodily injuries; and (2) to "Jill L. Craft, Attorney at Law" in the amount of Forty-Three Thousand, Three Hundred Thirty-Three Dollars and 33/100 (\$43,333.33), representing payment of attorney fees and costs and for which an IRS Form 1099 will issue. The checks will be sent to Derbonne's attorneys, Jill L. Craft, Attorney at Law, within fifteen (15) days after receipt by the Commission of an executed copy of this Agreement, as well as the appropriate IRS Forms. To the extent a 1099 must issue to Ms. Derbonne, the 1099 will not reflect payment of wages or income but only reflect settlement of personal injury and emotional distress damages." The total payment of \$130,000.00 represents all monies owed by the Commission to Derbonne in connection with this Agreement, including but not limited to any attorneys' fees and costs.

In return for, and in consideration of, the total payment discussed in Paragraph 1 2. above, Derbonne releases the Commission, the Commissioners, directors, executives, managers, agents, attorneys, supervisors, employees, and insurers (hereinafter "the Released Parties") from all legal claims, demands, liabilities and actions of any kind existing as of this date, whether known or unknown, which relate to or arise out of the services that she provided to the Commission, including but not limited to any and all claims arising under the laws of the State of Louisiana, including claims arising under the Louisiana Employment Discrimination Law, La. R.S. 23:301, et seg; the Louisiana Whistleblower Act, La. R.S. 23:967, the Louisiana and Federal Constitutions, and arising under any and all other federal, state and local laws and regulations prohibiting, without limitation, discrimination or harassment in employment, retaliation, conspiracy, tortious or wrongful discharge, assault and battery, breach of an express or implied contract, breach of a covenant of good faith and fair dealing, negligent or intentional infliction of emotional distress, defamation, misrepresentation or fraud, detrimental reliance or any other offense, quasi-offense or delictual or contractual or quasi-contractual claim which Derbonne may have, may ever have had or may ever have against the Released Parties, including any claims which were, could be or could have been asserted by her upon or by reason of any matter, cause or thing, up to and including the day on which Derbonne executes this Agreement, including but not limited to any and all claims Derbonne brought or could have brought in the Litigation and any and all claims related to the time period during which she provided services to the Commission and any of the Related Entities, and any and all claims relating in any manner to such claims. It is the intent of the parties to fully and finally compromise and settle all matters of any nature between the parties which have arisen through and including the date of this Agreement. This is a general release and should be construed as broadly as possible.

This Release excludes, and Derbonne does not release, waive or discharge: (i) claim(s) under state workers' compensation or unemployment laws; (ii) indemnification right(s) the Employee has against Employer; and/or (iii) any other right(s) or claim(s) that cannot be waived by law.

- 3. Derbonne releases all claims against the Released Parties willingly, freely, without duress and after having had her rights under all of the above laws fully explained to her by her counsel of choice, Jill L. Craft, Attorney at Law, and Derbonne further understands that if a court found in her favor, she could possibly receive an award or judgment for a larger sum than she received.
- 4. Derbonne also agrees that if she has filed any lawsuit, charge, claim, complaint or demand against the Released Parties for matters being released in Paragraph 2 above, then she will withdraw or dismiss the lawsuit, charge, claim, complaint or demand with prejudice and at her own cost and that she will file no other lawsuit, charge, claim, complaint or demand arising out of any matter released in Paragraph 2 above.

- 5. It is specifically understood and agreed that the Commission is not admitting liability in any respect whatsoever. Instead, this settlement is being made in the spirit of compromise and in order to avoid litigation.
- 6. Nothing in this Agreement prohibits or restricts Derbonne from filing an administrative charge or complaint with, or testifying, assisting, or participating in an investigation, hearing or proceeding conducted by, the Equal Employment Opportunity Commission (EEOC), the National Labor Relations Board (NLRB), the Occupational Safety and Health Administration (OSHA) or any other federal, state or local government agency, although by signing this Agreement the Employee waives, to the fullest extent permitted by law, any right to monetary or other relief (including front pay, back pay, reinstatement or other legal or equitable relief) related to any charge or complaint or other proceeding brought by the Employee or on the Employee's behalf by any third party, except for any right the Employee may have to receive an award from a government agency for information provided to the government agency.

Moreover, nothing in this Agreement prohibits, restricts or impedes Derbonne from exercising rights under Section 7 of the National Labor Relations Act (NLRA) to engage in joint activity with other employees.

Furthermore, nothing in this Agreement shall prohibit, restrict or impede Derbonne from exercising any other protected rights to the extent that such rights cannot be waived by agreement, or from complying with any other applicable law or regulation or valid order or request of a court of competent jurisdiction or authorized government agency, provided that such compliance does not exceed what such a law(s), regulation(s) or order(s) requires to be non-waivable by agreement.

- 7. Derbonne acknowledges that the settlement represents a compromise settlement of Derbonne's alleged damages. Derbonne understands that she is responsible for paying any federal, state, or local taxes on amounts received under this Agreement, if any, and the Commission makes no representation regarding any such liability. Derbonne unconditionally agrees to hold the Commission harmless, and to indemnify the Commission, from any and all liability which may be asserted against it by any taxing authority in connection with any taxes for which she is responsible as a result of this settlement.
- 8. Derbonne materially represents that she is the only person that has or had an economic or legal interest in this matter, other than her legal counsel identified herein. Derbonne agrees that if any person or entity claims an economic or other interest in these settlement funds, including any debtor, trustee, lien holder, or any bankruptcy court or agent, such interest is their sole responsibility and not that of the Commission. Thus, if any attorney's fees or sums are owed in connection with this matter that are not set forth

herein, Derbonne is personally responsible for payment of such fees out of the settlement proceeds or otherwise, and he unconditionally releases and discharges the Commission from any claim for any such interests, including attorney's fees and costs to Jill L. Craft, Attorney at Law, or any other law firm.

- As a term of this Agreement, the parties have fully considered Medicare's interests pursuant to the Medicare Secondary Payer rules, and in doing so, Derbonne has declared and hereby affirms that (a) Derbonne is not Medicare eligible, (b) Derbonne is not enrolled in the Medicare program, (c) Derbonne was not enrolled in the Medicare program at any relevant time or anytime thereafter through the date of this Agreement, and (d) Derbonne has not received Medicare benefits (either through ordinary Medicare or Medicare Advantage) for medical services or items related to, arising from, or in connection with the claims released in this Agreement. Derbonne represents and warrants that no Medicare payments have been made to or on behalf of her and that no liens, claims, demands, subrogated interests, or causes of action of any nature or character exist or have been asserted arising from or related to any of the claims released in this Agreement. Derbonne further agrees that she, and not any of the Released Parties, shall be responsible for satisfying any and all such liens, claims, demands, subrogated interests, or causes of action that may exist or have been asserted or that may in the future exist or be asserted. Based on these representations made by Derbonne, the parties have determined that Medicare has no interest in the payments under this Agreement and no reporting is required to Medicare. However, if Medicare (or the agency representing Medicare's interests) later determines that it does have an interest in the payment to Derbonne under this Agreement, Derbonne agrees to indemnify the Released Parties as soon as possible for any payments the Released Parties are required to make to Medicare (or the agency collecting on behalf of Medicare) as a result of the payments under this Agreement. Derbonne acknowledges and understands that in making payment to her pursuant to this Agreement, the Commission is reasonably relying on the representations and warranties made by Derbonne herein and these representations and warranties are a material inducement to the Commission to make payment as part of this Agreement.
- 10. Derbonne waives any right of reinstatement to, or employment or re-employmet with the Commission. If Derbonne applies for work, or reapplies for work, in the future with the Commission, then this Agreement will be a sufficient reason, by itself, for her ot to be hired or re-hired.
- 11. If any provision of this Agreement is held invalid, the parties agree that the remainder of the Agreement shall not be affected thereby and shall remain in full force and effect.
- 12. Derbonne attests that no other representations or inducements were made regarding the Agreement other than those contained herein. All prior agreements and understandings relating to this Agreement are hereby voided and/or superseded.

13.	Derbonne has had ample opportunity to review and consider this Agreement, and
she	has read and fully understands it. She has signed this Agreement freely, voluntarily
and	with the full knowledge that she is waiving all claims against the Released Parties.

Accepted and agreed to by Plaintiff, Cathy Derbonne:

Cathy Derbonne

Date