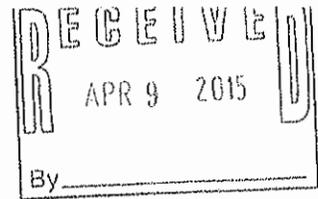


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RICHARD V. COSENTINO
Retired

ROBERT R. NICODEMO III*
JOSEPH D. CONNELL, JR.*
JOSEPH T. WALSH
*MEMBER OF NJ AND PA BARS

OUR FILE NO. 14-342 RN (CCC)

April 8, 2015

Adam S. Malamut, Esquire
Liebling & Malamut
1939 Route 70 East, Suite 220
Cherry Hill, NJ 08003

Re: DiNoto v. Bauer, et al

Dear Mr. Malamut:

This will confirm that the above matter has been settled for a total of \$20,000. In this regard, we enclose herewith the following closing instruments:

1. Original and copy of Release.
2. Original and copy of Stipulation of Dismissal.
3. Original and copy of Lien Payment Guarantee form.

Kindly have your client execute the Release in the presence of a notary and return the original to us along with the original executed Stipulation of Dismissal and Lien Payment Guarantee form.

Thank you for your attention to this matter.

Very truly yours,

LAW OFFICES OF NICODEMO & CONNELL
A Professional Corporation

By: 
ROBERT R. NICODEMO III

RRN/ges
Enclosure

cc: Michael Miller, Esquire

Release

Know all Men by these Presents:

That JOSEPH DINOTO

Hereinafter designated as the Releasor,
for and in consideration of the sum of TWENTY THOUSAND (\$20,000.00) Dollars
lawful Money of the United States of America, to the Releasor in hand paid on behalf of
WAYNE BAUER and NEW JERSEY MANUFACTURERS INSURANCE COMPANY

hereinafter designated as the Releasee, the receipt whereof is hereby acknowledged, has remised, released and forever discharged, and by these Presents does remise, release and forever discharge the said Releasee of and from all debts, obligations, reckonings, promises, covenants, agreements, contracts, endorsements, bonds, specialties, controversies, suits, actions, causes of action, trespasses, variances, judgments, extents, executions, damages, claims or demands, in law or in equity, which against said Releasee, the Releasor ever had, now has or hereafter can, shall, or may have, for, upon or by reason of any matter, cause or thing whatsoever, from the beginning of the world to the day of the date of these Presents.

More particularly, but not in limitation for all claims for personal injuries; medical expenses; pain and suffering; permanent injuries; loss of wages, salary, income, profits and/or earning capacity; aggravation or exacerbation of any pre-existing personal injuries and/or medical conditions; deprivation of physical liberties, deprivation of rights as a citizen of the United States; compensatory damages, special damages, exemplary damages, punitive damages; claims for attorney's fees and costs, and any and all other claims whatsoever arising out of an incident which occurred on or about November 19, 2012, in the Borough of Pennsauken, County of Camden and State of New Jersey, for which suit is presently pending in the Superior Court of New Jersey, Law Division, Gloucester County, under Docket No. L-4344-14.

The Releasor agrees that for and in consideration of the above sum, the undersigned hereby agrees to satisfy all liens or encumbrances which may apply to the above sum including but not limited to medical providers, medical insurance companies, HMOs, Medicare, Medicaid, Workers' Compensation liens and any and all subrogation claims and hereby agrees to indemnify all the above named Releasees and their respective insurance carriers against any further liability for the satisfaction of any such liens or encumbrances.

It is expressly understood and agreed that acceptance of the settlement is in full accord and satisfaction of and in compromise of the aforesaid claims and that payment thereof is not an admission of liability or responsibility, but made for the purpose of terminating any dispute and litigation between the parties.

Wherever in this instrument any party shall be designated or referred to by name or general reference, such designation is intended to and shall have the same effect as if the words "heirs, executors, administrators, personal or legal representative, successors and assigns" had been inserted after each and every such designation and all the terms, covenants and conditions herein contained shall be for and shall inure to the benefit of and shall bind the respective parties hereto, and their heirs, executors, administrators, personal or legal representatives, successors and assigns, respectively.

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