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Cook County Recorder

43.50

RELEASE AND SETTLEMENT AGREEMENT

0010923576

FOR AND IN SOLE CONSIDERATION of the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00), the receipt of which is hereby acknowledged, **JULITA LUCAS** does hereby:

1. Release, acquit and discharge **JOEL W. PENKUHN, DEBORAH PENKUHN, JEFFREY J. PENKUHN** and the estate of **WALTER J. PENKUHN**, and their heirs, successors and assigns from any and all actions, causes of action, claims and demands of whatsoever kind or nature on account of any and all known and unknown claims, causes of action, expenses, attorney's fees, loss of personal property, personal injuries, debts and obligations and any other loss or damage sustained or received by **JULITA LUCAS**, and in particular for all actions, causes of action, claims and demands resulting from the death of **WALTER J. PENKUHN** and the transfer or distribution of property or assets of any kind from **WALTER J. PENKUHN** and the estate of **WALTER J. PENKUHN** for which she claims **JOEL W. PENKUHN, DEBORAH PENKUHN, JEFFREY J. PENKUHN** and the estate of **WALTER J. PENKUHN** to be legally liable, including, but not limited to, the transfer of the real property located at 1110 Pfingsten, Glenview, Illinois, the transfer of money from bank accounts 350000275387, 1582051282 and 110608263482 at First Chicago Bank, and all claims or potential claims against Blue Cross/Blue Shield of Illinois.

2. Agrees to dismiss with prejudice case number 99 L 4661 entitled **JULITA LUCAS** versus **JOEL W. PENKUHN** and **JEFFREY PENKUHN** and all causes of action contained therein, filed and currently pending in the Circuit Court of Cook County.

3. Expressly agrees and understands that this Release and Settlement Agreement is binding on her agents, servants, employees, heirs, estate, successors and assigns.

4. Expressly agrees and understands that this Release and Settlement Agreement is entered into as a result of and in the spirit of compromise of a doubtful and disputed claim asserted by **JULITA LUCAS** in the above-referenced lawsuit; it is further agreed that liability on such claims is expressly denied by **JOEL W. PENKUHN, DEBORAH PENKUHN, JEFFREY J. PENKUHN** and the estate of **WALTER J. PENKUHN**, and that this Release and Settlement Agreement is not an admission against their interest and is entered into for the sole purpose of compromise and settlement.

JULITA LUCAS hereby declares that she has read and fully understands the terms of this Release and Settlement Agreement, that the amount stated herein is the sole consideration of this release and that she voluntarily accepts said sum for the purpose of making a full and final compromise, adjustment and settlement of all claims described above.

*Julita Lucas***JULITA LUCAS***by Peter R. Romany
as agent under Power
of Attorney*

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Mail to:

JOHN G. DOMBROWSKI

100 W. Monroe St.

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