

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,  
*Plaintiff,*

v.

C.A. No. 15-525-JJM-LDA

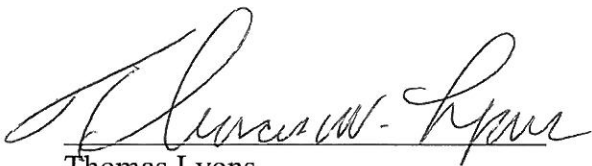
ROBERT F. STROM as the Finance Director  
Of the CITY OF CRANSTON, et al.  
*Defendants.*

**SETTLEMENT AGREEMENT**

Plaintiff, Edward Caniglia and the City of Cranston agree to resolve the pending case of *Caniglia vs. Strom, et al., Civil Action No. 1:15-cv-00525-JJM-LDA*, under the following terms:

1. The City of Cranston will issue a check to Edward Caniglia in the amount of \$31,000.00 to settle the remaining claim against the City of Cranston for Monell liability.
2. Notwithstanding that the U.S. District Court for the District of Rhode Island on October 27, 2021 rendered a decision that the Individual Defendants should be dismissed from the suit, Plaintiff will nevertheless release said Individual Defendants and the remaining Defendant, the City of Cranston by executing the attached release.
3. The City of Cranston will also reimburse costs and attorney's fees by checks made payable directly to these firms, person, or organization, as follows:
  - a) Strauss, Factor, Laing & Lyons for Fees and Expenses - \$176,496.44;
  - b) Attorney Lynette Labinger for Fees - \$15,638.93;
  - c) Skadden Arps for U.S. Supreme Court Costs - \$13,086.78; and
  - d) American Civil Liberties Union Foundation of Rhode Island for costs incurred- \$13,500.00.
4. All payments set forth above will be paid within 30 days after the City receives the fully executed release.

Upon payment of the sums set forth in paragraphs 1 and 3, the attached dismissal stipulation will be filed in the U.S. District Court for the District of Rhode Island shall set forth the payment of fees and expenses in paragraph 3 and shall state that "The Court finds that the sharing of the tribunal-approved award of attorney's fees with the American Civil Liberties Union Foundation of Rhode Island is consistent with this Court's decision in *Inmates of the RI Training School v. Martinez*, 465 F.Supp.2d 131 (D.R.I. 2006), and Rhode Island R.P.C. 5.4(a)(4).



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