

ATTORNEY GENERAL
STATE OF NEW HAMPSHIRE

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

PHILIP T. MCLAUGHLIN
ATTORNEY GENERAL



STEVEN M. HOURAN
DEPUTY ATTORNEY GENERAL

June 9, 2000

Personnel Appeals Board
Room 3
State House Annex
Capitol Street
Concord, NH 03301

Attention: Mary Ann Steele

RE: *Appeal of Vincent Urban*
00-D-4; 00-T-10

Dear Ms. Steele:

Enclosed for filing please find a copy of a fully executed Settlement Agreement and General Release.

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael A. Ricker".

Michael A. Ricker
Attorney
Civil Bureau

MAR/mp
Enclosure
CC: Barry S. Weinstein, Esquire
Fran DeCunto

STATE OF NEW HAMPSHIRE
PERSONNEL APPEALS BOARD

APPEAL OF VINCENT URBAN

00-T-10

RESPONDENT: STATE OF NEW HAMPSHIRE,
DEPARTMENT OF YOUTH DEVELOPMENT SERVICES

SETTLEMENT AGREEMENT

THE PARTIES HEREBY AGREE AS FOLLOWS:

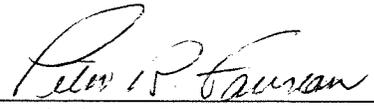
1. Vincent Urban will withdraw this appeal of termination with prejudice.
2. Vincent Urban will tender to the respondent a letter of resignation effective May 3, 2000.
3. Vincent Urban will execute a general release in favor of the respondent and all of its employees and agents.
4. The respondent will remove Vincent Urban's letter of termination from his personnel file and replace it with his letter of resignation.
5. The respondent will answer any request for an employment reference by indicating only that Vincent Urban was employed as a teacher and providing his dates of employment
6. The respondent will pay Vincent Urban his net wages for 2.5 months of employment and will reinstate his benefits retroactively for the three month period immediately prior to May 3, 2000.
7. The parties shall perform their obligations under this agreement as soon as is practicable and without undue or unreasonable delay.

8. An executed copy of this agreement shall be provided to the Personnel Appeals Board.

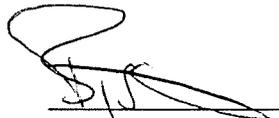
By signing below, the parties to this matter agree to be bound by the terms and conditions of this agreement. By signing below, the attorneys indicate their approval of the terms and conditions of this agreement.



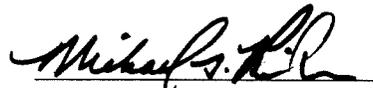
Vincent Urban/Date 6/3/00



Commissioner Peter Favreau/Date



Barry Weinstein, Esquire/Date 6/3/00

 5/15/00

Michael Ricker, Esquire/Date

GENERAL RELEASE

Know all persons that Vincent Urban of Manchester, New Hampshire, being of full age and having the capacity to consent, in exchange for valid consideration by the State of New Hampshire, specified in a settlement agreement executed between Vincent Urban and the Department of Youth Development Services, does hereby release and discharge the State of New Hampshire, the Department of Youth Development Services, Commissioner Peter Favreau, and all of the Department of Youth Development Services' employees (hereinafter collectively the State), their heirs, executors, administrators, successors and assigns, and persons or corporations legally responsible for their acts (hereinafter collectively the Other Released Parties) from any and all actions, damages, liabilities, causes of actions, debts, dues, claims and demands of every name and nature, both at law and in equity, including but by no means limited to claims for personal injuries, property damages attorney fees, and costs which, against the said State and other Released Parties, Vincent Urban, now has, or has ever had, or will ever have.

It is further understood that this settlement is not to be construed as an admission of liability on the part of the State or Other Released Parties, by whom liability is expressly denied.

In addition to the foregoing, it is specifically understood and agreed that this release is a full and final release and discharge of any claim or right to recover attorneys' fees and costs under state or federal statutory or common law, and that Vincent Urban shall not be deemed by virtue of this settlement, or any action

whatsoever taken by any of the parties or their representatives during the course of this litigation, a "prevailing party".

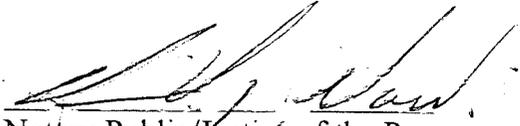
IN WITNESS WHEREOF, Vincent Urban has hereunto caused this General Release to be executed this 0rd day of June, 2000.



Vincent Urban

STATE OF NEW HAMPSHIRE
COUNTY

Personally appeared before me, this 3rd day of June, 2000, Vincent Urban, known to me (or satisfactorily proven) to be the person described in the foregoing instrument, and acknowledged that he executed the same in the capacity therein stated and for the purposes therein contained.



Notary Public/Justice of the Peace

IN WITNESS WHEREOF, Peter R. Favreau has hereunto caused this General Release to be executed this 18th day of May, 2000.



Peter R. Favreau, Commissioner
NH Department of
Youth Development Services

STATE OF NEW HAMPSHIRE
COUNTY OF Hillsborough

Personally appeared before me, this 18th day of May, 2000, Peter R. Favreau, known to me (or satisfactorily proven) to be the person described in the foregoing instrument, and acknowledged that he executed the same in the capacity therein stated and for the purposes therein contained.



Notary Public/Justice of the Peace