

4/6/15: LG-FYT  
DMH

INTEROFFICE MEMORANDUM

METROPOLITAN WATER RECLAMATION DISTRICT  
OF GREATER CHICAGO

DEPARTMENT: HUMAN RESOURCES

DATE: March 26, 2015

TO: David St. Pierre, Executive Director

FROM: Denice E. Korçal, Director of Human Resources

SUBJECT: Settlement of Automobile Property Damage Claim  
with USAA (representing Kyle Schmitt)  
Claim No: A/P 1351  
Employer: Metropolitan Water Reclamation District  
of Greater Chicago  
D/A: 7-23-2014

RECEIVED  
MWRDGC  
LAW DEPARTMENT

2015 APR -6 PM 2:28

On December 13, 2014, District employee Jennifer Burns, Administrative Assistant-Public Affairs, was travelling in a District vehicle on work business when she rear-ended another vehicle, which in turn struck the vehicle in front of it. The accident caused substantial damage to the vehicle driven by the claimant, Kyle Schmitt. The claim costs include the following charges:

Parts/Labor	\$4,755.88
Rental Car	651.26
Insurance Deductible	500.00
	<hr/>
	\$5,907.14

The claim for repairs can now be resolved for \$5,907.14.

This settlement is in the best interest of the District. We therefore request approval for payment and authorization to execute such documents as may be necessary to effect the settlement.

Approved by:



David St. Pierre  
Executive Director

DEK:RAJ:RG: aw

cc: Ruth Joplin, Ron Hill

4/9/15: LC-FYE  
omit

INTEROFFICE MEMORANDUM

METROPOLITAN WATER RECLAMATION DISTRICT  
OF GREATER CHICAGO

DEPARTMENT: HUMAN RESOURCES

DATE: March 26, 2015

TO: David St. Pierre, Executive Director

FROM: Denice E. Korçal, Director of Human Resources

SUBJECT: Settlement of Automobile Property Damage Claim  
with Rhonda Figgers  
Claim No: A/P 1362  
Employer: Metropolitan Water Reclamation District  
of Greater Chicago  
D/A: 11-16-2014

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MWRDGC  
LAW DEPARTMENT

Rhonda Figgers is a Laboratory Technician II at the Calumet Water Reclamation Plant. On November 16, 2014, her personal vehicle was parked near the District garage when it was side-swiped by a District vehicle driven by Gregory Jones, Treatment Plant Operator I, as he was backing out of the garage. This caused substantial damage to the right side and right rear-end of Ms. Figgers' vehicle. The claim costs for repairs to the vehicle include the following charges:

I. Labor	\$1,440.00
II. Replacements Parts	508.01
III. Additional Cost	323.54
	<hr/>
	\$2,271.55

The claim for repairs can now be resolved for \$2,271.55.

This settlement is in the best interest of the District. We therefore request approval for payment and authorization to execute such documents as may be necessary to effect the settlement.

Approved by:



David St. Pierre  
Executive Director

DEK:RAJ:RG: aw

cc: Ruth Joplin, Ron Hill

## Protecting Our Water Environment

### BOARD OF COMMISSIONERS

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### Metropolitan Water Reclamation District of Greater Chicago

100 EAST ERIE STREET

CHICAGO, ILLINOIS 60611-3154

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#### RONALD M. HILL

General Counsel

312.751.6565 f: 312.751.6598

ronald.hill@mwr.org

April 28, 2015

Mr. David St. Pierre  
Executive Director  
OFFICE

Re: Request for Approval of Settlement in Progressive Northern Insurance Co. as/o Janet Weiss Kelly v. Mark Kirchman, Case No. 15 M1 10054, in the Amount of \$3,030.00 for Damages Sustained to its Insured's Vehicle Due to an Accident with a District Vehicle

Dear Sir:

The Law Department seeks approval to enter into a settlement agreement with Progressive Northern Insurance Co. ("Progressive") for damages to its insured's vehicle due to an accident with a District vehicle driven by District employee, Mark Kirchman ("Kirchman").

The Complaint alleges that on January 30, 2014, Mr. Kirchman was exiting a parking lot in the area of Des Plaines Avenue and Roosevelt Road in Chicago, Illinois, when he struck Ms. Weis-Kelly's vehicle, sustaining damages to her vehicle in the amount of \$4,037.32.

The District's Law Department has filed an appearance on behalf of Mr. Kirchman. An initial evaluation of the collision reveals that liability cannot be definitively established without further investigation, likely involving retention of an accident reconstructionist. Jeff Deutschmann, the attorney representing Progressive, contacted the District in an attempt to negotiate a settlement. After much negotiation, Progressive has demanded \$3,030.00, and the Risk Management Department has indicated that this demand is acceptable.

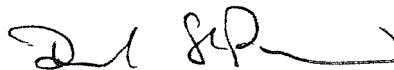
Based upon the cost of further investigating and litigating this matter, the Law Department believes it is in the District's best interest to settle in the amount of \$3,030.00. Therefore, the General Counsel respectfully requests that the Executive Director approve the settlement in the amount of \$3,030.00 and that the General Counsel be given the authority to execute such documents as may be necessary to effectuate settlement.

Respectfully submitted,

Approved by:



Ronald M. Hill  
General Counsel



David St. Pierre  
Executive Director

RMH:LLD:PS

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### Metropolitan Water Reclamation District of Greater Chicago

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#### RONALD M. HILL

General Counsel

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ronald.hill@mwrdd.org

June 2, 2015

Mr. David St. Pierre  
Executive Director  
O F F I C E

Re: Settlement of Grace M. Devereux v. MWRD, Case No. 14 L 5858,  
Circuit Court of Cook County Illinois, for the sum of \$4,500.00

Dear Sir:

Grace M. Devereux is a Hoisting Engineer assigned to MWRD's Calumet Plant. On June 2, 2014, Ms. Devereux filed the above-noted lawsuit against the MWRD alleging disability and gender discrimination.

This matter can now be settled as follows: Ms. Devereux will dismiss this lawsuit and release the MWRD from all claims related to her employment (excluding her pending claims before the Illinois Workers' Compensation Commission) up through the date of the settlement's execution in exchange for the MWRD's payment of \$4,500.00, which is inclusive of all attorneys' fees and costs.

The General Counsel believes this is a reasonable settlement to conclude this matter and requests payment of the referenced sums be approved, and he be authorized to execute any further documents as may be necessary to effectuate the settlement.

Respectfully submitted,



Ronald M. Hill  
General Counsel

Approved by:



David St. Pierre  
Executive Director

RMH:LAG:EJF:ldl

cc: Lisa Goldberg  
Brenda Holmes