

EXHIBIT 1

From: Stephen Kallman <steve@kallmanlegal.com>
Sent: Monday, November 6, 2023 5:23 PM
To: Sarah Riley Howard <showard@pinskysmith.com>
Cc: David Kallman <dave@kallmanlegal.com>
Subject: Re: Tentative settlement agreement

Those additional terms and changes are correct.

Steve Kallman
Kallman Legal Group, PLLC
Attorney at Law

5600 W. Mount Hope Hwy.

Lansing, MI 48917

Phone: [\(517\) 322-3207](tel:(517)322-3207)

Fax: [\(517\) 322-3208](tel:(517)322-3208)

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From: Sarah Riley Howard <showard@pinskysmith.com>
Sent: Monday, November 6, 2023 5:21:40 PM
To: Stephen Kallman <steve@kallmanlegal.com>
Cc: David Kallman <dave@kallmanlegal.com>
Subject: RE: Tentative settlement agreement

Those terms are all correct, except for addition/correction of the following: Ms. Hambley stays until at least 11/30/23, but no later than 12/15/2023.

Ms. Mansaray's last day is 1/31/**2024**.

County will continue liability coverage/county indemnity for AH and MM for any suits or claims of any kind arising out of their employment, whether they committed any act or not.

County drops the charges against AH and dismisses the hearing.

From: Stephen Kallman <steve@kallmanlegal.com>
Sent: Monday, November 6, 2023 5:15 PM
To: Sarah Riley Howard <showard@pinskysmith.com>
Cc: David Kallman <dave@kallmanlegal.com>
Subject: Tentative settlement agreement

Sarah,

As we discussed, the following is the tentative settlement agreement to have a global settlement of all issues. The terms are:

Payment of 4 million dollars to Ms. Hambley.

Ms. Hambley resigns from her position but will remain in office until 12/15/23 at the latest.

Marcia Mansaray will resign from her position and her final day will be 1/31/23. She will be placed on paid administrative leave two days after the signing of the agreement. She will also receive one year severance with benefits or until such time as she has obtained employment at 75% of what she earned at Ottawa county.

All parties, including Ms. Mansaray, will execute a full and final release of all claims, known and unknown, and will dismiss all pending litigation. The county will not appeal the court of appeals decision in Hambley v Ottawa county.

The county will continue its liability coverage for Ms. Hambley and Ms. Mansaray for any acts they committed while in their official capacity.

Thanks,

Steve Kallman
Kallman Legal Group, PLLC
Attorney at Law

5600 W. Mount Hope Hwy.

Lansing, MI 48917

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Fax: [\(517\) 322-3208](tel:5173223208)

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