

1 **WHEREAS**, the Developer alleges that the Stop Work Order is a violation of the Developer's Due
2 Process of Law under the Article 2, Section 21, of the Arkansas Constitution and that Developer is entitled
3 to relief against the City of Little Rock, Arkansas, Mayor Frank Scott, Jr., the Planning & Development
4 Department, and Jamie Collins, former Planning & Development Department Director under the Arkansas Civil
5 Rights Act of 1993, Ark. Code Ann. § 16-123-101, et seq; and,

6 **WHEREAS**, after careful consideration of various arguments and issues, it has been determined that
7 it is in the best interest of all the parties to fully and finally compromise and settle the controversies between
8 them in connection with the Claims; and,

9 **WHEREAS**, upon execution of the Settlement and Release of Claims Agreement (Settlement
10 Agreement), the City of Little Rock will pay the Developer the amount of Three Hundred Thousand Dollars
11 (\$300,000.00), subject to the conditions stated in the Settlement Agreement.

12 **NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE CITY**
13 **OF LITTLE ROCK, ARKANSAS:**

14 **Section 1.** The City Manager and City Clerk are authorized to execute any settlement and release of
15 claims agreements, in a form acceptable to the City Attorney,

16 **Section 2.** The City of Little Rock shall agree to pay the amount of Three Hundred Thousand Dollars
17 (\$300,000.00), pursuant to the terms of the Settlement Agreement which include, among other things, that
18 he developer, The Struggle is Real, LLC, will provide four culverts to deal with drainage issues within the
19 area of Carter Lane.

20 **Section 3. Severability.** In the event any title, section, paragraph, item, sentence, clause, phrase, or
21 word of this resolution is declared or adjudged to be invalid or unconstitutional, such declaration or
22 adjudication shall not affect the remaining portions of the resolution, which shall remain in full force and
23 effect as if the portion so declared or adjudged invalid or unconstitutional were not originally a part of the
24 resolution.

25 **Section 4. Repealer.** All laws, ordinances, resolutions, or parts of the same, that are inconsistent with
26 the provisions of this resolution, are hereby repealed to the extent of such inconsistency.

27 **ADOPTED: August 6, 2024**

28 **ATTEST:**

APPROVED:

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30 _____
31 **Susan Langley, City Clerk**

_____ **Frank Scott, Jr., Mayor**

32 **APPROVED AS TO LEGAL FORM:**

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34 _____
35 **Thomas M. Carpenter, City Attorney**

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