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At the Jerusalem Magistrate Court

CA 3906/96

Scheduled for March 17, 1997

Before the Honorable Judge Mizrahi

- The Plaintiffs:**
1. _____ **Abu Laban**
 2. **Abu Laban** _____
 3. _____ **Abu Laban**

All represented by counsel, Adv. Hala Huri of
HaMoked: Center for the Defence of the Individual,
founded by Dr. Lotte Salzberger
4 Abu Obeida St., Jerusalem

v.

- The Defendants:**
1. **Dror Yitshari**
 2. **Israel Defence Forces**
 3. **Minister of Defence, Mr. Shimon Peres**

Represented by the Tel Aviv District Attorney's Office (Civil)
1 Henrietta Szold Street, Tel Aviv 42946
Tel.: 03-6970222 Fax: 03-6918541

Settlement Agreement

The parties' counsels hereby advise the honorable court that they have reached a settlement as follows:

1. The defendants, by the State of Israel, will pay the plaintiffs a total amount of 40,000 ILS (forty thousand ILS), including attorney's fees according to the law and VAT for the full and final settlement of their entire claims in the action filed in C.A. 3906/96 – in connection with the accident being the subject matter of the action, whether now existing or which may exist in the

future of any kind and nature whatsoever including claims of various benefactors, whether now existing or which may exist in the future of any kind and nature whatsoever, and all this without assuming liability or acknowledging the amount of the damage.

2. From the date of the above payment, no person and/or body will have any claim and/or demand in connection with and/or concerning the accident being the subject matter of the statement of claim and/or the action in C.A. 3906/96 – its causes and/or anything related thereto and/or arising there-from.

The plaintiffs will compensate the State of Israel and/or defendant No. 1 and/or defendant No. 3 immediately upon their first demand if any claim and/or demand is filed against it by any person or body as aforesaid, for any payment paid by them for the accident including any damage which may be suffered by them as a result of the filing of any such claim and/or demand.

3. The amount specified in section 1 above will be paid to plaintiffs' counsel within 45 days from the date plaintiffs' counsels deliver to defendants' counsels a certified copy of a judgment giving the above settlement an effect, otherwise said amount will bear linkage differentials and interest from the date of delivery of the judgment to defendants' counsel.
4. Each party will bear its own expenses.
5. The honorable court is hereby requested to give the above settlement an effect of a judgment.

(signed)

(signed)

Hala Huri, Advocate

Counsel to plaintiffs

Shachar Frenkel, Advocate

Counsel to defendants

Judgment

I hereby give the above agreements the effect of a judgment.

March 11, 1997

(signed)