

Pinchuk, the sum of 80,000 ILS for the full, final and complete waiver of all claims, of any kind and nature whatsoever, that the plaintiff may have against the defendants in connection with the incident being the subject matter of the claim, including waiver of claims of any benefactors whatsoever, whether now existing or which may exist in the future.

- b. The sum of 80,000 ILS will be paid within 30 days from the date a certified copy of a judgment giving the above settlement an effect is received at the Tel Aviv District Attorney's Office (Civil).

Any amount not paid within 30 days as aforesaid will bear linkage differentials and interest as defined in the Adjudication of Interest and Linkage Law from the date of the judgment until the date full payment is actually made.

- c. Following the payment of the sum of 80,000 ILS as aforesaid, no person and/or body will have any claim and/or demand whatsoever against the State of Israel and/or its employees and/or agents and/or anyone on its behalf (hereinafter: the State) in connection with and/or concerning the incident being the subject matter of the statement of claim.

The plaintiffs will jointly and/or severally compensate the State immediately upon its first demand if any claim and/or demand is filed by any person or body as aforesaid, for any payment or expense borne by the State as a result of any such claim and/or demand.

- d. The claim against defendant 1 will be deleted.
- e. Each party will bear its own expenses.

2. The honorable court is hereby requested:

- a. to delete the claim against defendant 1 without an order for expenses.
- b. to give this agreement and all of its terms and conditions an effect of a judgment.

(signed)

(signed)

Michal Pinchuk, Advocate
Counsel to plaintiffs

Avraham Ronen, Advocate
Senior deputy A to Tel Aviv District Attorney (Civil)

Tel Aviv, 14 Tamuz 5759

June 28, 1999

No. T/98/5001