

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

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| C.C., ET AL, |) | |
| |) | |
| Plaintiffs, |) | Case No.: 3:17-cv-00369 |
| |) | |
| v. |) | JUDGE CRENSHAW/ |
| |) | MAGISTRATE JUDGE HOLMES |
| CHRYSTAL TEMPLETON, ET AL, |) | |
| |) | |
| Defendants. |) | Jury Demand |

JOINT AMENDED MOTION TO APPROVE MINOR SETTLEMENT

Come now the parties, by and through the undersigned counsel, who request of the court approval of a settlement in this cause as to all defendants and all causes of action for the benefit and on behalf of the minor children, plaintiffs. In support of this motion, it will be shown unto the court the following:

1. The plaintiffs and defendant City of Murfreesboro have reached a negotiated settlement as to all claims against the identified defendants which incorporates a total payment in satisfaction of the alleged and disputed claims in the sum of \$85,000.00 (\$28,333.33 per child).
2. The plaintiffs and defendant Rutherford County have reached a negotiated settlement as to all claims against Rutherford County, which incorporates a total payment in satisfaction of the alleged and disputed claims in the sum of \$1,500.00 (\$500.00 per child).
3. Pursuant to the contract and agreement existing between plaintiffs and counsel, \$59,500.00 (\$19,833.33 per child) of such claims would be divided and distributed equally for the benefit of the minor children, Christal Crawford, Charity Crawford, and Christopher Crawford.

4. Pursuant to the contract and agreement existing between plaintiffs and their retained counsel, counsel would receive the total sum of \$27,000.00, which is inclusive of all attorney's fees, expenses, and costs.
5. Plaintiffs, individually, and with assistance of counsel, have contacted and intend to engage financial advisor, Eric D. Williams, with Edward Jones, 14983 Old Hickory Blvd, Nashville, Tennessee 37211-6485, (615) 333-1888, as to assistance and utilization of professional guidance in the investment of such funds on behalf of the minor children.
6. Plaintiffs and parents of the minor children, Zacchaeus and Lavonia Crawford, would respectfully submit and request the release and utilization of \$9,500.00 (\$3,166.66 per child) of such funds by the parents for the immediate use and benefit of the minor children pursuant to T.C.A. § 34-1-104(c).
7. Pursuant to T.C.A. § 29-34-105(d), plaintiffs and parents of the minor children, Zacchaeus and Lavonia Crawford, would respectfully submit and request that the court approve the investment of the remaining sums (\$50,000.00) (\$16,666.66 per child) in the specified investment programs and instruments as identified with Eric D. Williams, with Edward Jones for the use and benefit of the minor children in equal shares as to disbursement as to each child as a child reaches 18 years of age.
8. Plaintiffs and parents of the minor children, Zacchaeus and Lavonia Crawford, would respectfully submit their acceptance and acknowledgement of a court order disallowing any removal or withdrawal of said funds without express permission by court order.
9. Plaintiffs and parents of the minor children, Zacchaeus and Lavonia Crawford, pursuant to their signatures upon the release and settlement agreements, acknowledged their agreement and approval of the attorney's fees as further supported by the time sheets and affidavits of their retained counsel.

WHEREFORE, plaintiffs respectfully request that this matter be set upon the court's docket at the earliest opportunity and that the court approve the settlement of this cause on behalf and in the best interest of the minor children.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on the 24th day of August 2017. Notice of this filing will be sent by operation of the Court's electronic filing system to:

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