

**ILLINOIS WORKERS' COMPENSATION COMMISSION  
SETTLEMENT CONTRACT LUMP SUM PETITION AND ORDER**

John Halgren )  
v. ) Case # 10 WC 036015  
 )  
City of Naperville )

**SETTLEMENT CONTRACT RIDER  
TERMS OF SETTLEMENT**

Petitioner hereby agrees to accept a lump sum in the amount of one hundred twelve thousand five hundred eighty three dollars and ninety four cents (\$112,583.94), in full, final, and complete settlement of any and all claims and compensation the Petitioner has against the Respondent under the Illinois Occupational Disease and Illinois Workers' Compensation Act for Petitioner's Acute Lymphocytic Leukemia. Respondent has paid Petitioner's medical expenses that were incurred prior to the approval of the contract and concern Petitioner's Acute Lymphocytic Leukemia. The Respondent was self-insured at all relevant times pursuant to this agreement and will hold petitioner harmless from any claim for reimbursement for these payments from the City's group health insurance provider. This lump sum settlement represents a 15.0% loss of a man-as-whole (\$46,497.75) under Section 8(d)(2) of the Act, \$31,440.19 in lost wages, \$26,000.00 for reimbursement of out-of-pocket medical expenses, and \$8,646.00 in future medical expenses.

Respondent denies that Petitioner has incurred any injuries to the degree alleged and that any such injuries are compensable and this settlement is only made to amicably resolve disputed issues so as to avoid further litigation. This settlement resolves disputes concerning temporary total disability and permanent partial disability compensation, as well as all medical, surgical, and hospital expenses resulting from the said accidental injuries. Respondent is hereby released, acquitted, and discharged from any and all liability under both the Workers' Compensation Act and the Occupational Disease Act, in any way arising out of the alleged accidental occurrences herein.

Petitioner represents that he is not currently a Medicare beneficiary and is not otherwise Medicare eligible nor is he receiving or has he applied for Social Security Disability or Retirement benefits. Petitioner further represents that he has not applied for Social Security benefits and does not anticipate applying for benefits in the next six (6) months nor does he have a reasonable expectation of Medicare entitlement in the next thirty (30) months.

The submission of this contract is contingent upon approval of the lump sum petition which is a part hereof and all rights of review under Sections 8(a), 19(h) and 4(c) of the Workers Compensation Act are expressly waived. By entering into this agreement, Respondent does not waive and in fact reserves any and all of its rights under Section 5 of the Workers Compensation Act.

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John Halgren, Petitioner      Date

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Kristen Foley, Respondent's Attorney

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Mike Doerries, Petitioner's Attorney