

EXHIBIT

"A"

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ATTORNEYS AT LAW

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April 18, 2022

RULE 11 CONDEMNATION SETTLEMENT AGREEMENT

Via e-mail [oddo@barronadler.com](mailto:oddo@barronadler.com) and [york@barronadler.com](mailto:york@barronadler.com)

Christopher Oddo and Andrew York

Barron, Adler, Clough & Oddo, LLP

808 Nueces St.

Austin, Tx 78701

Re: CORR Downtown Park  
Cause No. 21-1925-CC3; *CORR v. McConico, et al.*

Dear Mr. Oddo and Mr. York:

Please allow this letter to constitute a Rule 11 Settlement Agreement between City of Round Rock, Texas ("City") and the McConicos ("your clients") in connection with the project identified herein and the fee simple interest to be acquired as part of the City's downtown park plans. The terms of this Agreement and the settlement reached are as follows:

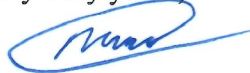
1. Both parties agree to recess and reset the special commissioner hearing currently set on April 18, 2022 until May 27, 2022 so the City Council can consider this settlement agreement at their meeting set on May 12, 2022.
2. Subject to City Council approval, City agrees to pay, and your clients agree to accept, the total sum of One Million Three Hundred Thousand and No/100 Dollars (**\$1,300,000**) in compensation to the Condemnees in the above referenced lawsuit for the acquisition of 6.12 acres sought to be acquired, with such location and acquisition as further described in City's current pleadings on file in this case.

If City Council approves this agreement, the parties agree that an Agreed Special Commissioners Award in this amount shall be entered by the appointed commissioners at the hearing recessed to May 27, 2022.

3. It is agreed that neither City nor your clients will file objections to the Award of Special Commissioners in this cause so long as the City Council approves the \$1,300,000 settlement amount on May 12, 2022.
4. City agrees to consider naming all or a portion of the above referenced property or facilities after the McConicos.
5. Subject to City Council approval of this agreement, City agrees to deposit \$1,300,000 within 30 days of the court signed Award of Special Commissioners.

If this letter correctly sets forth the terms of our Rule 11 agreement and the settlement reached between the City and your clients, please so indicate by having the appropriate person execute this letter in the space indicated below on behalf of the property owners.

Very truly yours,



Mylan W. Shaunfield  
Sheets & Crossfield, PLLC  
Attorneys for City

**AGREED AND ACCEPTED:**



\_\_\_\_\_  
Barron, Adler, Clough & Oddo, LLP  
808 Nueces St.  
Austin, Tx 78701

Andrew Yonk

Date: 4/18/22

**AGREED AND ACCEPTED:**

ROUND ROCK, TEXAS

By: \_\_\_\_\_  
Craig Morgan  
Mayor

Date: \_\_\_\_\_

**AGREED AND ACCEPTED:**

GEORGETOWN, TEXAS

*Wendi Efflandt*

By: \_\_\_\_\_

Wendi Lester Efflandt  
Attorney Ad Litem

Date: **April 19, 2022**