



# Pinellas County

## Staff Report

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**File #:** 22-0106A, **Version:** 1

**Agenda Date:** 2/8/2022

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**Subject:**

Proposed settlement in the case of Raymond Mireles v. Pinellas County; Circuit Civil Case No. 20-003080-CI-19.

**Recommended Action:**

Consideration of the proposed settlement in the case of Raymond Mireles v. Pinellas County.

**Strategic Plan:**

N/A

**Summary:**

The above-referenced case is being brought to the Board of County Commissioners for consideration in accordance with the confidential memorandum of February 8, 2022.

**Background Information:**

This matter was previously brought before the Board on August 11, 2020, under Legistar item no. 20-1304A.

**Fiscal Impact:**

Unknown.

**Staff Member Responsible:**

Jewel White, County Attorney

Christy Donovan Pemberton, Managing Assistant County Attorney

Ashley N. Donnell, Senior Assistant County Attorney

Merry Celeste, Division Director, Purchasing and Risk Management, Administrative Services

**Partners:**

N/A

**Attachments:**

N/A



## Pinellas County

315 Court Street, 5th Floor  
Assembly Room  
Clearwater, Florida 33756

### Staff Report

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**File #:** 22-0106A

**Agenda Date:** 2/8/2022

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**Subject:**

Proposed settlement in the case of Raymond Mireles v. Pinellas County, Circuit Civil Case No. 20-003080-CI-19 – allegations of negligence resulting in personal injuries.

**Recommended Action:**

Approve the proposed \$100,000.00 settlement in the case of Raymond Mireles v. Pinellas County.

**Strategic Plan:**

N/A

**Summary:**

On October 29, 2018, a Pinellas County employee driving a truck with an attached trailer rear-ended the vehicle owned and operated by Raymond Mireles. Mr. Mireles suffered damage to his vehicle as well as permanent injury. This settlement will release any and all of Plaintiff's claims against the County arising from this accident.

It is recommended that the proposed settlement be approved. Risk Management and County Administration concur with this recommendation.

**Background Information:**

N/A

**Fiscal Impact:**

Total amount of claim to be paid by the County is \$100,000.00.

**Staff Member Responsible:**

Jewel White, County Attorney

Christy Donovan Pemberton, Managing Assistant County Attorney

Ashley N. Donnell, Senior Assistant County Attorney

Merry Celeste, Division Director, Purchasing and Risk Management, Administrative Services

**Partners:**

N/A

**Attachments:**

N/A



# Pinellas County

## Staff Report

#39

File #: 21-2530A, Version: 1

Agenda Date: 1/11/2022

### **Subject:**

Proposed settlements in the cases of Leighanna Staley v. Pinellas County, Florida; Circuit Civil Case No. 20-000979-CI-15, and Barbara J. Hetrick v. Pinellas County, Florida; Circuit Civil Case No. 21-002538-CI-11, which arose out of the same incident.

### **Recommended Action:**

Consideration of the proposed settlements in the cases of Leighanna Staley v. Pinellas County, Florida, and Barbara J. Hetrick v. Pinellas County, Florida.

### **Strategic Plan:**

N/A

### **Summary:**

The above-referenced cases are being brought to the Board of County Commissioners for consideration in accordance with the confidential memorandum dated January 11, 2022.

### **Background Information:**

Leighanna Staley v. Pinellas County, Florida was previously brought before the Board on April 7, 2020, under Legistar item no. 20-515A.

Barbara J. Hetrick v. Pinellas County, Florida was previously brought before the Board on June 22, 2021, under Legistar item no. 21-1128A.

### **Fiscal Impact:**

Unknown.

### **Staff Member Responsible:**

Jewel White, County Attorney

Christy Donovan Pemberton, Managing Assistant County Attorney

Jared D. Kahn, Assistant County Attorney

Merry Celeste, Division Director, Purchasing and Risk Management, Administrative Services

### **Partners:**

N/A

### **Attachments:**

N/A



## Pinellas County

315 Court Street, 5th Floor  
Assembly Room  
Clearwater, Florida 33756

### Staff Report

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**File #:** 21-2530A

**Agenda Date:** 01/11/2022

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**Subject:**

Proposed settlements in the cases of Leighanna Staley v. Pinellas County, Florida; Circuit Civil Case No. 20-000979-CI-15, and Barbara J. Hetrick v. Pinellas County, Florida; Circuit Civil Case No. 21-002538-CI-11, which arose out of the same incident.

**Recommended Action:**

Authorize settlement authority up to \$285,636.67 to settle the cases of Leighanna Staley v. Pinellas County and Barbara J. Hetrick v. Pinellas County, Florida.

**Strategic Plan:**

N/A

**Summary:**

On July 13, 2017, Plaintiffs were driving at or near 54<sup>th</sup> Avenue, S. and 50<sup>th</sup> Street, S. in St Petersburg when Ms. Hetrick's vehicle was struck by a County vehicle driven by a former County employee. The impact of the accident caused Ms. Hetrick's vehicle to strike the vehicle in front of her, belonging to Ms. Staley. Both Plaintiffs were injured as a result of the accident.

Risk previously paid compensation in this matter totaling \$14,363.33, which leaves \$285,636.67 remaining within the County's sovereign immunity cap. Ms. Hetrick incurred medical bills in excess of \$157,000.00 for treatment her physicians attribute to the accident. Ms. Staley incurred medical bills totaling \$72,133.57.

Plaintiffs have negotiated amongst themselves and have proposed settlement within the remainder of the sovereign immunity cap to resolve all claims they have against the County, as well as the remaining subrogation claim of Ms. Hetrick's insurance company.

It is recommended that settlement authority be granted up to \$285,636.67 to resolve these matters. Risk Management and County Administration concur with this recommendation.

**Background Information:**

Leighanna Staley v. Pinellas County, Florida was previously brought before the Board on April 7, 2020, under Legistar item no. 20-515A.

Barbara J. Hetrick v. Pinellas County, Florida was previously brought before the Board on June 22, 2021, under Legistar item no. 21-1128A.