

STATE OF NORTH CAROLINA
COUNTY OF WAKE

AFFIDAVIT

Shuting Wang, individually and as Administrator of the Estate of Zijie Yan, being duly sworn, deposes and says:
(Print Name of Claimant)

1. My name is Shuting Wang, individually and as Administrator of the Estate of Zijie Yan
2. I live at N/A and my mailing address is [REDACTED]
(See requirements on p. 2 regarding change of mailing address)
3. I hereby file a claim against UNC-Chapel Hill and its employees and contractors for whom UNC-CH is liable
(State Agency or County Board of Education)
and its mailing address is Carolina Square Building C, 123 W Franklin St Suite 600A, Chapel Hill, NC 27516
4. I have been damaged in the amount of \$ 1,000,000.00 by reason of the negligent conduct of the employee/agent
named here the Wrongful Death of Professor Zijie Yan.
(Name(s) of negligent employee/agent)
5. The injury or accident giving rise to this claim occurred at UNC-CH main campus
(Print Name of County and Exact Location Where Accident Occurred)
on August 28, 2023 M.
(Month) (Day) (Year) (Time)

6. The injury or property damage occurred in the following manner:
(Give BRIEF Statement of What Happened, Witness Names, etc.)
Professor Zijie Yan was killed by a UNC Student who suffered from a variety of severe mental illnesses, including Schizophrenia and who had threatened Professor Yan on several occasions.

7. The damages claimed above consist of The Wrongful Death of Professor Zijie Yan
(Itemize Repair Bill, Medical Bills, etc.)

* NOTARIZATION IS MANDATORY [REDACTED] [REDACTED] 09/17/2025
(Signature of Claimant) (Email address) (Date)

Subscribed and sworn to before me this 17th day of April 2025
[REDACTED] My Commission Expires February 8, 2030
Signature and Seal of Clerk of Court or Notary Public

FILE TWO COMPLETE COPIES WITH THE INDUSTRIAL COMMISSION AND SEE FILING FEE REQUIREMENTS ON P. 3

JOHN M. PERNA
NOTARY PUBLIC
Wake County, North Carolina
My Commission Expires February 8, 2030

ATTORNEYS: FILE WITH AN IC FILE NUMBER VIA EDFP
[HTTP://WWW.IC.NC.GOV/DOCFILING.HTML](http://www.ic.nc.gov/docfiling.html) OR
IF NO IC FILE NUMBER, FOLLOW PLAINTIFF FILING OPTIONS.
PLAINTIFFS: MAIL TO: INDUSTRIAL COMMISSION CLERK'S OFFICE
1236 MAIL SERVICE CENTER
RALEIGH, NC 27699-1236
VIA HAND DELIVERY: BUSINESS DAYS FROM 8 AM - 5 PM
DOBBS BUILDING
430 NORTH SALISBURY STREET
RALEIGH, NC 27603

STATE OF NORTH CAROLINA

COUNTY OF Wake**AFFIDAVIT**

Kevin Bunn as GAL to minor [REDACTED], being duly sworn, deposes and says:

(Print Name of Claimant)

My name is Kevin Bunn, as GAL to minor [REDACTED]2. I live at N/A and my mailing address is _____

(See requirements on p. 2 regarding change of mailing address)

3. I hereby file a claim against UNC Chapel Hill and its employees and contractors for whom UNC-CH is liable.

(State Agency or County Board of Education)

and its mailing address is Carolina Square Building C, 123 W Franklin St., Suite 600A, Chapel Hill, NC 275164. I have been damaged in the amount of \$ 1,000,000.00 by reason of the negligent conduct of the employee/agentnamed here The wrongful death of Professor Zijie Yan
(Name(s) of negligent employee/agent)5. The injury or accident giving rise to this claim occurred at UNC-CH
(Print Name of County and Exact Location Where Accident Occurred)on August 28, 2023 M.
(Month) (Day) (Year) (Time)

6. The injury or property damage occurred in the following manner:

(Give BRIEF Statement of What Happened, Witness Names, etc.)

Professor Zijie Yan was killed by a UNC student who suffered from a variety of severe mental illness, including Schizophrenia and who had threatened Professor Yan on several occasions.7. The damages claimed above consist of The wrongful death of Professor Zijie Yan
(Itemize Repair Bill, Medical Bills, etc.)

*NOTARIZATION IS MANDATORY

(Signature of Claimant)

(Email address)

(Date)

4-22-25

Subscribed and sworn to before me this 22nd day of April, 2025
My Commission Expires February 8, 2030

Signature and Seal of Clerk of Court or Notary Public

FILE TWO COMPLETE COPIES WITH THE INDUSTRIAL COMMISSION AND SEE FILING FEE REQUIREMENTS ON P. 3

JOHN M. PERNA
NOTARY PUBLIC
 Wake County, North Carolina
 My Commission Expires February 8, 2030

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INSTRUCTIONS

The North Carolina Tort Claims Act requires that every affidavit submitted must show **ALL** of the following:

1. The name of the claimant.
2. The name of the state department, institution or agency against which the claim is filed.
3. The name of the state employee upon whose alleged negligence the claim is based.
4. The amount of damages sought to be recovered.
5. The time and place where the injury occurred.
6. A brief statement of the facts and circumstances surrounding the injury.
7. If the claim involves a school bus, the claim should be filed against the particular **COUNTY** Board of Education concerned and **NOT** against the State Board of Education.
8. A claim for property damage to a motor vehicle must be in the **NAME OF THE REGISTERED OWNER OF THE VEHICLE ONLY**.

INDUSTRIAL COMMISSION REQUIREMENTS REGARDING CONTACT INFORMATION (INCLUDING CHANGE OF MAILING ADDRESS) ARE SET OUT IN THE RULE APPEARING BELOW:

11 NCAC 23B .0105 CONTACT INFORMATION

- (a) "Contact information" for purposes of this Rule shall include telephone number, facsimile number, email address, and mailing address.
- (b) All persons or entities without legal representation who have matters pending before the Commission shall inform the Commission of any change in contact information by filing a written notice via the Commission's Electronic Document Filing Portal ("EDFP"), email to contactinfo@ic.nc.gov, facsimile to (919) 715-0282, U.S. mail sent to Office of the Clerk, 1236 Mail Service Center, Raleigh North Carolina 27699-1236, private courier service in accordance with Rule .0101 of this Section, or hand delivery in accordance with Rule .0101 of this Section.
- (c) A plaintiff without legal representation who was an inmate in the North Carolina Division of Adult Corrections at the time of filing his or her tort claim, shall, within 30 days of release, provide the Commission with written notice of his or her post-release contact information in any manner authorized in Paragraph (b) of this Rule. Following the initial written notice of post-release contact information, the previously incarcerated plaintiff shall continue to inform the Commission of all changes in contact information in accordance with Paragraph (b) of this Rule.
- (d) All attorneys of record with matters before the Commission shall provide and maintain current contact information for the Commission's records via EDFP.
- (e) Instructions on how to provide and update contact information via EDFP are available at <https://www.ic.nc.gov/docfiling.html>.

**INDUSTRIAL COMMISSION REQUIREMENTS REGARDING FILING FEES ARE SET OUT IN THE RULE
APPEARING BELOW:**

11 NCAC 23B .0103 FILING FEES

- (a) No tort claim shall be accepted for filing with the Commission unless the claim is accompanied by an attorney's check, certified check, money order, or electronic transfer of funds in payment of a filing fee in an amount equal to the filing fee required for the filing of a civil action in the Superior Court division of the General Court of Justice.
- (b) The provisions of Paragraph (a) of this Rule notwithstanding, a tort claim that is accompanied by a Petition to Sue as an Indigent shall be accepted for filing upon the date of its receipt.
- (c) A Petition to Sue as an Indigent shall consist of an affidavit sufficient to satisfy the provisions of G.S. 1-110, stating that plaintiff is unable to comply with Paragraph (a) of this Rule.
- (d) If the Commission determines the plaintiff is able to pay the fee assessed under this Rule, an Order shall be issued directing payment of that fee, and the plaintiff shall, within 30 days from receipt of the Order, forward to the Commission an attorney's check, certified check, money order, or electronic transfer of funds for the full amount required to be paid. Failure to submit the required amount of the filing fee within this time shall result in the tort claim being dismissed without prejudice.
- (e) Upon consideration of a prison inmate's Petition to Sue as an Indigent, the Commission shall determine whether the inmate's tort claim is frivolous and whether to dismiss the claim, pursuant to G.S. 1-110. Appeals from the dismissal of a frivolous tort claim pursuant to G.S. 1-110 shall proceed directly to the Full Commission and shall be decided without oral argument.

STATE OF NORTH CAROLINA

COUNTY OF Wake**AFFIDAVIT**

Kevin Bunn as GAL to minor [REDACTED], being duly sworn, deposes and says:
(Print Name of Claimant)

My name is Kevin Bunn, as GAL to minor [REDACTED]

2. I live at N/A and my mailing address is _____

(See requirements on p. 2 regarding change of mailing address)

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(Itemize Repair Bill, Medical Bills, etc.)

* NOTARIZATION IS MANDATORY

[REDACTED]
(Signature of Claimant)

[REDACTED]
(Email address)

4-22-25
(Date)

Subscribed [REDACTED] day of April, 2025
 My Commission Expires February 8, 2030

Signature and Seal of Clerk of Court or Notary Public

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APPLICATION FOR APPOINTMENT OF GUARDIAN AD LITEM

The use of this Form is required under Rule 11 NCAC 23B .0203.

Shuting Wang, individually and as Admin of the Estate of Zijie Yan The University of North Carolina at Chapel Hill
and _____
Kevin Bunn, as GAL to minors _____ v. _____
Plaintiff (s) Defendant (s)

TO THE NORTH CAROLINA INDUSTRIAL COMMISSION:

The undersigned Shuting Wang respectfully shows unto the North Carolina Industrial Commission that _____ is an ☒ infant or ☐ incompetent without general or testamentary guardian in this State, and that by reason thereof can bring an action only by a guardian ad litem; that the infant or incompetent has a cause of action against the defendants on account of the following matter and things:

The Wrongful Death of Professor Zijie Yan

The undersigned is a reputable person closely connected with the infant or incompetent having the relationship with the infant or incompetent as follows: Mother

WHEREFORE, the undersigned prays the Commission that a fit and proper person be appointed Guardian Ad Litem for the infant or incompetent for the purpose of bringing on his or her behalf an action as above set out.

Signature of Applicant J

Date 04/17/2025

(Please complete page 2 of form)

ORDER APPOINTING GUARDIAN AD LITEM

It appearing to the North Carolina Industrial Commission from the above application that _____ is an ☒ infant or ☐ incompetent having no general or testamentary guardian within this State and that said infant or incompetent appears to have a good cause of action against the defendant(s); and it further appearing to the Commission after due inquiry that Kevin Bunn is a fit and proper person to be appointed guardian ad litem for the infant or incompetent for the purpose of bringing this action on his or her behalf;

IT IS THEREFORE ORDERED that Kevin Bunn be and is hereby appointed guardian ad litem of _____ to bring this action on his or her behalf.

This _____ day of _____

Commissioner, Deputy Commissioner, or Executive Secretary

SEND TO: ATTORNEYS: FILE WITH AN IC FILE NUMBER VIA EDPF
[HTTPS://WWW.IC.NC.GOV/DOCFILING.HTML](https://www.ic.nc.gov/docfiling.html) OR IF NO IC FILE
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Clerk's Office, 1236 Mail Service Center, Raleigh, NC 27699-1236 OR
File via hand delivery: Business days from 8 a.m. – 5 p.m., Dobbs
Building, 6th floor, 430 N. Salisbury Street, Raleigh, NC 27603 OR
Fax to (919) 715-0282 OR Email to dockets@ic.nc.gov.

PLEASE TYPE OR PRINT:

Full name and address of minor or incompetent:

[REDACTED]

[REDACTED]

Birth date of minor:

[REDACTED]

Full name and address of proposed guardian ad litem:

Kevin Bunn, Attorney at Law,

[REDACTED]

IMPORTANT INFORMATION FOR PARTIES

Parties should take notice of the provisions set forth in Rule 11 NCAC 23B .0203.

11 NCAC 23B .0203 INFANTS AND INCOMPETENTS

(a) Persons seeking to appear on behalf of an infant or incompetent in accordance with G.S. 1A-1, Rule 17 shall apply on a Form T-42 Application for Appointment of Guardian ad Litem. The Commission shall appoint a guardian ad litem if it is in the best interest of the minor or incompetent. The Commission shall appoint the guardian ad litem only after due inquiry as to the fitness of the person to be appointed.

(b) The Commission may assess a fee to be paid to an attorney who serves as a guardian ad litem for actual services rendered upon receipt of an affidavit of actual time spent in representation of the minor or incompetent as part of the costs.

SEND TO: **ATTORNEYS:** FILE WITH AN IC FILE NUMBER VIA EDFP
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Shuting Wang, individually and as Admin of the Estate of Zijie Yan The University of North Carolina at Chapel Hill
and
Kevin Bunn, as GAL to minors v.
Plaintiff (s) Defendant (s)

TO THE NORTH CAROLINA INDUSTRIAL COMMISSION:

The undersigned Shuting Wang respectfully shows unto the North Carolina Industrial Commission that [REDACTED] is an ☒ infant or ☐ incompetent without general or testamentary guardian in this State, and that by reason thereof can bring an action only by a guardian ad litem; that the infant or incompetent has a cause of action against the defendants on account of the following matter and things:

The Wrongful Death of Professor Zijie Yan

The undersigned is a reputable person closely connected with the infant or incompetent having the relationship with the infant or incompetent as follows: Mother

WHEREFORE, the undersigned prays the Commission that a fit and proper person be appointed Guardian Ad Litem for the infant or incompetent for the purpose of bringing on his or her behalf an action as above set out.

Signature of Applicant [REDACTED]

Date 04/17/2025

(Please complete page 2 of form)

ORDER APPOINTING GUARDIAN AD LITEM

It appearing to the North Carolina Industrial Commission from the above application that [REDACTED] is an ☒ infant or ☐ incompetent having no general or testamentary guardian within this State and that said infant or incompetent appears to have a good cause of action against the defendant(s); and it further appearing to the Commission after due inquiry that Kevin Bunn is a fit and proper person to be appointed guardian ad litem for the infant or incompetent for the purpose of bringing this action on his or her behalf;

IT IS THEREFORE ORDERED that Kevin Bunn be and is hereby appointed guardian ad litem of [REDACTED] to bring this action on his or her behalf.

This _____ day of _____

Commissioner, Deputy Commissioner, or Executive Secretary

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PLEASE TYPE OR PRINT:

Full name and address of minor or incompetent:

[REDACTED]

[REDACTED]

Birth date of minor: [REDACTED]

Full name and address of proposed guardian ad litem:

[REDACTED]

[REDACTED]

IMPORTANT INFORMATION FOR PARTIES

Parties should take notice of the provisions set forth in Rule 11 NCAC 23B .0203.

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Fax to (919) 715-0282 OR Email to dockets@ic.nc.gov.



**NORTH CAROLINA INDUSTRIAL COMMISSION
OFFICE OF THE CLERK
CERTIFICATE OF SERVICE**

Date: May 9, 2025

I.C. NO. TA-032531, SHUTING WANG, Individually and Administrator of the Estate of ZIJIE YAN, Plaintiffs v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

I.C. NO. TA-032532, [REDACTED] Minor, by KEVIN BUNN, as Guardian ad Litem, Plaintiff v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

I.C. NO. TA-032533, [REDACTED] Minor, by KEVIN BUNN, as Guardian ad Litem, Plaintiff v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

*****ORDER IS BEING RE-SERVED AS DEFENDANTS COUNSEL WAS NOT PROPERLY SERVED*****

THIS IS TO CERTIFY that on the date above a copy of the attached document was sent to the following parties and persons in the manner specified below. When sent by mail, the document was sent to the specified address. When sent by email, the document was sent to the specified email address.

Plaintiff:

☒ Email: Doug Abrams, dabrams@abramslawfirm.com
Michael Bertics, mwb@ncdisability.com
Kevin Bunn, kbunn@kevinbunn.com

Defendant(s):

☒ Email: Elizabeth B. Jenkins, ejenkins@ncdoj.gov

Certified by: Holly Martin, Administrative Specialist



**NORTH CAROLINA INDUSTRIAL COMMISSION
OFFICE OF THE CLERK
CERTIFICATE OF SERVICE**

Date: May 8, 2025

I.C. NO. TA-032531, SHUTING WANG, Individually and Administrator of the Estate of ZIJIE YAN, Plaintiffs v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

I.C. NO. TA-032532, [REDACTED] Minor, by KEVIN BUNN, as Guardian ad Litem, Plaintiff v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

I.C. NO. TA-032533, [REDACTED], Minor, by KEVIN BUNN, as Guardian ad Litem, Plaintiff v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

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Plaintiff:

☒ Email:

Doug Abrams, dabrams@abramslawfirm.com
Michael Bertics, mwb@ncdisability.com
Kevin Bunn, kbunn@kevinbunn.com

☒ Email:

Elizabeth B. Jenkins, ejenkins@ncdoj.gov

Certified by:

Holly Martin, Administrative Specialist

NORTH CAROLINA INDUSTRIAL COMMISSION

I.C. NO. TA-032531, SHUTING WANG, Individually and Administrator of the Estate of ZIJIE YAN, Plaintiffs v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

I.C. NO. TA-032532, [REDACTED], Minor, by KEVIN BUNN, as Guardian ad Litem, Plaintiff v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

I.C. NO. TA-032533, [REDACTED], Minor, by KEVIN BUNN, as Guardian ad Litem, Plaintiff v. STATE OF NORTH CAROLINA and UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Defendant.

ORDER APPROVING SETTLEMENT PURSUANT TO N.C. GEN. STAT. § 143-295 by WANDA BLANCHE TAYLOR, Commissioner.

Filed: May 8, 2025

A duly-executed Release of Tort Claim has been submitted by the parties for the undersigned's consideration.

A P P E A R A N C E S

Plaintiffs: Abrams & Abrams, P.A., Raleigh, North Carolina, Doug Abrams,
Counsel of Record for Shuting Wang, Individually and as
Administrator of the Estate of Zijie Yan.

Lennon, Camak and Bertics, PLLC, Raleigh, North Carolina, Michael
Bertics, Counsel of Record for Minors [REDACTED] and [REDACTED].

Kevin Bunn, Cary, North Carolina, Guardian ad Litem to Minors [REDACTED]
[REDACTED] and [REDACTED].

Defendant: Department of Justice, Raleigh, North Carolina; Special Deputy
Attorney General Elizabeth B. Jenkins, Counsel of Record.

* * * * *

This cause comes before the undersigned pursuant to N.C. Gen. Stat. §§ 143-291 and 143-295 for an order approving the settlement between Plaintiffs and Defendants and directing disbursement of settlement proceeds, pursuant to the terms contained in the parties' Form T-3 settlement agreement and other documentation submitted, including Plaintiffs' Forms T-1, the

Affidavit of Shuting Wang with exhibits, the Affidavit of Kevin Bunn, and a Byrd Settlements funding letter (the “Settlement Documents”).

The Industrial Commission has considered the Settlement Documents. The Industrial Commission finds the basic facts to be as set out in the Settlement Documents. The Industrial Commission, having made due inquiry into all the facts and circumstances of the case, concludes as follows:

1. The settlement in the amount of \$750,000.00 (SEVEN HUNDRED FIFTY THOUSAND DOLLARS) reached by the Parties as set forth in the Settlement Agreement is fair, reasonable, just and in the best interest of minors [REDACTED] and [REDACTED], and Shuting Wang, individually and as Administrator of the Estate of Zijie Yan, and should be approved.

2. Plaintiffs’ attorneys have rendered valuable legal services in the preparation, prosecution and settlement of this claim, and these attorneys are entitled to reasonable and just compensation for legal services rendered. Their contingency fee of 20% should be approved. The 20% fee is to be divided: 50% to Abrams & Abrams, P.A. and 50% to Lennon, Camak and Bertics, PLLC.

3. After payment of attorneys’ fees and costs and expenses, the remainder of the settlement in the amount of \$600,000.00 (SIX HUNDRED THOUSAND DOLLARS) shall be paid, pursuant to the provisions of N.C. Gen. Stat. §§ 143-291 and 143-295 as follows:

a. The amount of \$200,000.00 (TWO HUNDRED THOUSAND DOLLARS) to Shuting Wang as spouse;

b. The amount of \$200,000.00 (TWO HUNDRED THOUSAND DOLLARS) paid directly to MetLife Assignment Company, Inc. shall be used to purchase a Structured Settlement Annuity for the benefit of [REDACTED] the minor

child of decedent with terms of the structure described in the addendum to the release; and

c. The amount of \$200,000.00 (TWO HUNDRED THOUSAND DOLLARS) paid directly to MetLife Assignment Company, Inc. shall be used to purchase a Structured Settlement Annuity for the benefit of [REDACTED] the minor child of decedent with terms of the structure described in the addendum to the release.

4. The Guardian ad Litem has rendered actual services including at least 50.75 hours in representation of the minor Plaintiffs. A fee in the amount \$325.00 per hour, totaling \$16,493.00 (SIXTEEN THOUSAND FOUR HUNDRED NINETY-THREE DOLLARS) is reasonable compensation for these services and should be assessed as costs, pursuant to 11 NCAC 23B .0203.

It is, therefore, ORDERED, ADJUDGED AND DECREED:

1. The Parties' settlement as set out in the Form T-3 Settlement Agreement attached to this order, is approved.

2. Plaintiffs' counsel fees based on a 20% contingency of the total recovery is approved and shall be paid directly by defendant to counsel, \$75,000.00 (SEVENTY-FIVE THOUSAND DOLLARS) to Abrams & Abrams, P.A. and \$75,000.00 (SEVENTY-FIVE THOUSAND DOLLARS) to Lennon, Camak and Bertics, PLLC.

3. The amount of \$200,000.00 (TWO HUNDRED THOUSAND DOLLARS) shall be paid directly to Shuting Wang, wife of Decedent Zijie Yan.

4. The amount of \$200,000.00 (TWO HUNDRED THOUSAND DOLLARS) paid directly to MetLife Assignment Company, Inc. shall be used to purchase a Structured Settlement

Annuity for the benefit of the minor child of decedent, [REDACTED] with terms of the structure described in the addendum to the release.

5. The amount of \$200,000.00 (TWO HUNDRED THOUSAND DOLLARS) paid directly to MetLife Assignment Company, Inc. shall be used to purchase a Structured Settlement Annuity for the benefit of the minor child of decedent, [REDACTED] with terms of the structure described in the addendum to the release

6. The amount of \$16,493.00 (SIXTEEN THOUSAND FOUR HUNDRED NINETY-THREE DOLLARS) shall be paid by defendants separately and directly to Kevin Bunn, Attorney at Law, PC, as compensation for services as Guardian ad Litem.

s/Taylor, C.

Form No. T-3

**NORTH CAROLINA INDUSTRIAL COMMISSION
RALEIGH, NORTH CAROLINA****SETTLEMENT AGREEMENT AND RELEASE**

KNOW BY ALL THESE PRESENTS, that we, Shuting Wang, individually and as Administrator of the Estate of Zijie Yan, and Kevin Bunn, as duly appointed Guardian ad Litem to minors [REDACTED] and [REDACTED] ("Plaintiffs"), being over 18 years of age, for the sole consideration of \$750,000 (seven hundred and fifty thousand dollars and no cents) to be disbursed in accordance with the attached Disbursement Order, \$1633.75 (one thousand six hundred thirty-three dollars and seventy-five cents) representing Plaintiffs' share of mediation costs, plus any costs awarded to the Guardian ad Litem by the Industrial Commission (hereinafter the "Settlement Amount") to be paid by and on behalf of the Released Parties (defined below), the payment whereof being made under the provision of N.C.G.S. § 143-291 et seq., do hereby release and discharge and by these presents do for ourselves, our heirs, executors, administrators, and assigns release and forever discharge the State of North Carolina, the University of North Carolina and its constituent institutions (the "University"), including but not limited to the University of North Carolina at Chapel Hill, all of the University's Boards and programs, and all former and current governors, trustees, members, officers, directors, employees, servants, representatives, attorneys, administrators, insurers, and agents of these entities, and all predecessors and successors of the above-named entities and individuals (in both their official and individual capacities), (all of the above collectively the "Released Parties") of and from any and all claims, demands, damages, actions, and causes of action of any kind or nature, known or unknown, arising out of or related to Zijie Yan's death, which took place on or about August 28, 2023 at or near Caudill Laboratory at the University of North Carolina at Chapel Hill in Orange County, North Carolina (the "Incident"), including the matters referred to in Plaintiffs' T-1 Affidavits. Unless otherwise stipulated herein, each party shall bear its own fees and costs.

The University of North Carolina at Chapel Hill, on behalf of itself and the other Released Parties, will make payment on any valid lien previously disclosed to it by Plaintiffs up to the Settlement Amount directly to the lien holder. Plaintiffs agree to defend, indemnify, and hold harmless the Released Parties against any claim seeking the recovery of or enforcement of any valid lien whatsoever. Furthermore, Plaintiffs expressly acknowledge that they have an independent legal obligation under 42 C.F.R. § 411.24(h), as currently in effect or hereinafter modified, to satisfy any Medicare lien or interest, which they agree is the sole and separate obligation of Plaintiffs.

Plaintiffs further hereby agree to defend, indemnify, and save harmless the Released Parties of and from any and all claims of any sort from any party claiming to be subrogated, or to have any other type of legal or equitable claims to the proceeds, or any part of the proceeds paid in exchange for this release. This indemnification extends to, and includes indemnification from, all costs, attorneys' fees, and medical bills that might be incurred as a result of such claim. Plaintiff further agree and understand that they are responsible for paying any taxes that result from the settlement proceeds, and will hold harmless Released Parties of and from any and all

claims related to the amount of taxes or penalties that Plaintiffs may be found to owe on the Settlement Amount.

The Parties agree that the this Settlement Agreement and Release shall be governed by, construed, and enforced in accordance with the laws of the State of North Carolina and that the place of this Settlement Agreement, its situs and forum, shall be Orange County, North Carolina, where all matters relating to the validity, construction, interpretation, and enforcement shall be determined, without regard to the principles of conflicts of laws thereof.

By signing this Settlement, we acknowledge that we have read, understood, and agree with all terms and conditions stated in the Agreement, and that we are signing this Agreement knowingly and voluntarily, that we are agreeing to be legally bound by all terms and conditions set out therein, and that we have had the opportunity to consult with legal counsel of our own choosing regarding the terms set forth herein.

Plaintiffs understand that this release is made as compromise of a disputed claim to avoid expense and to terminate all controversy and/or claims for damages of whatever nature, known or unknown, including future developments thereof, and it is therefore specifically agreed that this release shall be a complete bar to all claims or suit for injuries or damages relating to, and resulting or to result from the Incident referred to in Plaintiffs' Affidavits. Plaintiffs hereby agree to file Voluntary Dismissals with Prejudice of these actions, I.C. FILE NOs. TA032531, TA032532, TA032533, and [REDACTED] within 15 days of the receipt of the proceeds of this settlement.

IN WITNESS WHEREOF, I have hereunto set my hand, this the 24th day of April, 2025.

[REDACTED]
Witness

[REDACTED]
Street Address

[REDACTED]
City, State, Zip

[REDACTED]
Shuting Wang, individually and as
Administrator of the Estate of Zijie
Yan

[REDACTED]
Street Address

[REDACTED]
City, State, Zip

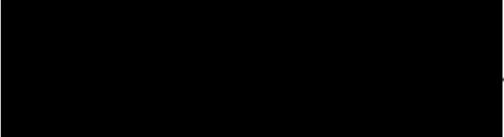
[REDACTED]
Kevin Bunn, Guardian ad Litem to
minors [REDACTED] and [REDACTED]

AGREED TO:

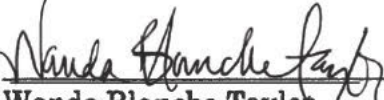
JEFF JACKSON
ATTORNEY GENERAL


Elizabeth B. Jenkins
Special Deputy Attorney General
Attorney for Released Parties


Michael Bertics
Attorney for  *and* 


Doug Abrams
*Attorney for Shuting Wang, individually and
as Administrator of the Estate of Zijie Yan*

APPROVED PURSUANT TO N.C.G.S. § 143-295 this the 8th day of May, 2025.


Wanda Blanche Taylor
Deputy Commissioner

ADDENDUM TO THE SETTLEMENT AGREEMENT AND RELEASE

In consideration of the release set forth above the Insurer on behalf of the Defendant agrees to pay **\$400,000.00** directly to **MetLife Assignment Company, Inc.** for the purchase of a structured settlement annuity for the benefit of [REDACTED] and [REDACTED] (payees) periodic payments outlined below:

Periodic payments made according to the schedule as follows (the "Periodic Payments"):

Periodic Payments made payable to [REDACTED] (payee):

Guaranteed Lump Sum: \$153,626.23 paid as a lump sum on 08/12/2034 guaranteed.

Guaranteed Lump Sum: \$189,588.20 paid as a lump sum on 08/12/2038 guaranteed.

Periodic Payments made payable to [REDACTED] (payee):

Guaranteed Lump Sum: \$194,702.91 paid as a lump sum on 02/13/2039 guaranteed.

Guaranteed Lump Sum: \$239,956.97 paid as a lump sum on 02/13/2043 guaranteed.

All sums set forth herein constitute damages on account of personal injuries and sickness in a case involving physical injury or physical sickness within the meaning of Section 104(a)(1) of the Internal Revenue Code of 1986, as amended.

Right to Payments

Payee acknowledges that the Periodic Payments cannot be accelerated, deferred, increased or decreased by any payee; nor shall any payee have the power to sell, mortgage, encumber, or anticipate the Periodic Payments, or any part thereof, by assignment or otherwise.

Payee's Beneficiary

Any payments to be made after the death of any Payee pursuant to the terms of this Settlement Agreement shall be made to such person or entity as shall be designated in writing by Payee to the Insurer or the Insurer's Assignee. If no person or entity is so designated by Payee, or if the person designated is not living at the time of the Payee's death, such payments shall be made to the estate of the Payee. No such designation, nor any revocations thereof, shall be effective unless it is in writing and delivered to the Insurer or the Insurer's Assignee. The designation must be in a form acceptable to the Insurer or the Insurer's Assignee before such payments are made.

Consent to Qualified Assignment

Payee acknowledges and agrees that the Insurer may make a "qualified assignment", within the meaning of Section 130(c) of the Internal Revenue Code of 1986, as amended, of the Insurer's liability to make the Periodic Payments set forth above to **MetLife Assignment Company, Inc.** (the "Assignee"). The Assignee's obligation for payment of the Periodic Payments shall be no greater than that of Insurer (whether by judgment or agreement) immediately preceding the assignment of the Periodic Payments obligation.

Any such assignment, if made, shall be accepted by the Payee without right of rejection and shall completely release and discharge the Insurer from the Periodic Payments obligation assigned to the Assignee. The Payee recognizes that, in the event of such an assignment, the Assignee shall be the sole obligor with respect to the Periodic Payments obligation, and that all other releases with respect to the Periodic Payments obligation that pertain to the liability of the Insurer shall thereupon become final, irrevocable and absolute.

Right to Purchase an Annuity

Insurer, itself or through its Assignee, reserves the right to fund the liability to make the Periodic Payments through the purchase of an annuity policy from **Metropolitan Tower Life Insurance Company** (the "Annuity Issuer"). The Insurer or the Assignee shall be the sole owner of the annuity policy and shall have all rights of ownership. The Insurer or the Assignee may have **Metropolitan Tower Life Insurance Company** mail payments directly to the Payee. The Payee shall be responsible for maintaining a current mailing address with **Metropolitan Tower Life Insurance Company**.

Discharge of Obligation

The obligation assumed by **Metropolitan Tower Life Insurance Company** and/or its assignee with respect to any required payment shall be discharged upon the mailing on or before the due date of a valid check in the amount specified to the address of record for Payee, or by direct deposit or electronic funds transfer if so requested. However, if a check is lost or otherwise not received, the Annuity Issuer, upon notification of said check being lost, or not received, shall promptly reissue said check, subject to verification of "stop payment" that Payee has not negotiated said check. Payee recognizes that Assignee shall be the sole obligor with respect to the obligations assigned, and that all other releases that pertain to the liability of Insurer shall thereupon become final, irrevocable and absolute.

[REDACTED]
Shuting Wang, individually and as
Administrator of the Estate of Zijie Yan

[REDACTED]
Kevin Bunn, Guardian ad Litem to
minors [REDACTED] and [REDACTED]

[REDACTED]
Michael Bertics
Attorney for [REDACTED] and [REDACTED]

[REDACTED]
Doug Abrams
Attorney for Shuting Wang, individually and as
Administrator of the Estate of Zijie Yan

NORTH CAROLINA INDUSTRIAL COMMISSION

I.C. No. 23-740336. KEVIN BUNN, guardian ad litem for [REDACTED] and [REDACTED] minor children and presumed whole dependents of ZIJIE YAN, Deceased-Employee, Plaintiffs v. UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, Employer, SELF-INSURED (CORVEL CORPORATION, Third Party Administrator), Defendant.

**FEE PETITION AND AFFIDAVIT OF KEVIN BUNN
GUARDIAN AD LITEM FOR [REDACTED]**

I, KEVIN BUNN, being duly sworn, depose and say that:

- 1) I am an attorney licensed to practice law in the State of North Carolina.

Furthermore, I am a Board-Certified Specialist in North Carolina workers' compensation law. I make this affidavit on personal knowledge;
- 2) On October 4, 2023, I was appointed by Meredith R. Henderson, Executive Secretary of the North Carolina Industrial Commission, to serve as the Guardian ad Litem for the minors [REDACTED] and [REDACTED] in this action;
- 3) I have in that capacity exercised my independent judgment in regard to this claim;
- 4) This matter was settled by Settlement and Release on April 29, 2025.
- 5) The customary fee for Guardian ad Litem services in Wake County, North Carolina, is \$325 per hour;
- 6) My services in this claim have included but are not limited to retaining and assisting counsel, coordinating various components of this claim among the attorneys involved, and reviewing discovery, motions, and other documents. My time in this case on behalf of Plaintiffs exceeds 50.75 hours. See attached.
- 7) The amount of \$16,493 is reasonable remuneration for my services in this matter.
- 8) The attached invoice was previously submitted to Counsel for defendants, who has not advised that she objects.

WHEREFORE, pursuant to 11 NCAC 23A .0604, I respectfully petition the Industrial Commission to enter its Order assessing a fee in the amount of \$16,493 to be paid to me by defendants for services rendered.

Signed this 29th day of April, 2025.



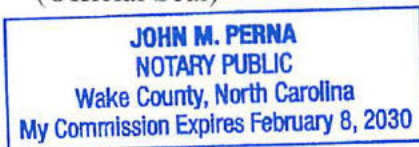
Kevin Bunn

NORTH CAROLINA
WAKE COUNTY

I, John M. Perna, a Notary Public for said County and State, do hereby certify that Kevin Bunn personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 29th day of April, 2025.

(Official Seal)



Notary Public

My commission expires: February 8, 2030

TIMESHEET – YAN v. UNC

9-12-23	MTG WITH S WANG (SW), EMAILS, PREP [REDACTED] DISC WITH POTENTIAL COUNSEL	125
9-14-23	LTR TO EX SEC, REVIEW CIRCUMSTANCES AROUND SHOOTING	45
9-18-23	PREP AND [REDACTED]	35
9-24-23	REVIEW MEDIA ARTICLES	35
9-28-23	CONVS WITH SW RE ESTATE/COORDINATION ISSUES	62
10-9-23	REVIEW ARTICLE RE ACTIVE TRAINING FOR STAFF/STUDENTS	12
10-27-23	CONV WITH SW	12
11-6-23	EMAILS CALLS TO ADJ/ATTY	10
11-7-23	CONV WITH LF RE DENIAL, [REDACTED]	32
11-10-23	CONV WITH SW RE DENIAL ETC	28
11-14-23	CONV WITH SW	12
11-20-23	REVIEW EXCLUSIVE REMEDY/ELECTION OF REMEDIES	125
11-22/23-23	DISC WITH DOUG ABRAMS, SW ADVISED	25
11-24-23	TALK TO SW	10
11-27-23	REVIEW MEDIA ARTICLES ON INCAPACITY DETERMINATION	35
12-4-23	REVIEW CASELAW	45
12-6-23	DISCUSS WITH DA	20
12-18-23	DRAFT EMAIL TO CAMAK/BERTICS AND REVIEW FEE AGREEMENT	50
12-21-23	CONV WITH SW	7
1-8-23	CONV WITH SW	9
1-12	CONV WITH DA	12
1-31	CONV WITH SW	22
2-9-24	MEETING WITH DA AND SW	70
3-27-24	REVIEW RESEACH	145
4-3-24	CONV WITH SW	5

4-11-24	CONV WITH MB/MC	15
4-22-24	CONV WITH MB/MC, CONV WITH SW, EMAIL TO ALL COUNSEL	22
4-24-23	REVIEW DISC TO DEFS	15
5-16-24	REVIEW MEDIA ARTICLE, REVIEW UNC REPORT	42
5-17-24	UPDATE SW	7
7-26-24	REVIEW EMAIL AND CONV RE BERTICS/CAMAK RE DISC RESPONSES	35
7-31-24	REVIEW DISCOVERY	55
8-8-24	REVIEW NON-DISCLOSURE AGMT	20
8-13-24	DISC WITH MB/NC RE NON-DISCLOSURE AGMT, REVIEW REVISIONS	45
8-14-24	DISC WITH SW RE MEDIATION	15
8-23-24	CONV WITH SW RE DENIAL	7
9-12-24	REVIEW PROTECTIVE ORDER, DISCUSS WITH MB AND NC	45
10-4-24	REVIEW FINAL PO, UPDATE SW	25
11-7-24	CONV W/MB AND NC RE SUPP DISC	20
11-13-24	CONV WITH SHUTING	5
11-13-24	REVIEW SUPP DISCOVERY	195
11-18-24	REVIEW SUPP DISC, EMAIL TO MB/NC	225
11-19-24	EMAIL TO MB/NC RE COMM TO DA	25
11-27/29	CONV AND EMAILS TO/FROM SW	17
12-17-24	MEDIATION	290
12-18-24	CONV WITH SHUTING	5
1-12-25	CONV WITH DA, EMAILS, REVIEW FILE	48
1-13-25	EMAILS, DEMAND	112
1-16-25	CONV WITH SW	10
1-17-25	MEDIATION	280
1-22-25	CONV WITH SW AND EMAILS TO ATTYS	30
12-27/28/29	EMAILS RE SETTLEMENT	25
2-11-25	CONV WITH SW	11
2-14-25	SETTLEMENT MTG WITH SW, DA, COUNSEL	72

2-17-25	CONV WITH DA, REVIEW SETTLEMENT AGREEMENT	43
2-18-25	CONV WITH SW RE SETTLEMENT	15
2-20/21-25	EMAILS AND CALLS WITH SW AND DA RE ANNUITY, REVIEW QUOTES	40
2-25/25-25	EMAILS RE SETTLEMENT PROCESS	5
2-28-25	PHONE CALL WITH AG, UNC ETC	20
3-3-25	CONV WITH MH, CONV WITH JG, CONV WITH WB	80
3-14-25	PREP/REVIEW T1'S, T42'S, SW AFFID	45
3-29-25	PREP/REVIEW ORDER	32
4-8	DOCUMENT REVIEW	25
4-10	DOCUMENT REVIEW	18
4-14	CONV WITH SW, REVISION TO DOCS DISTRIBUTION OF DOCS	25

3045/60 = 50.75 hours x \$325 = \$16,493

I.C. FILE NO. TA-032531; TA-032532; TA-032533

NORTH CAROLINA INDUSTRIAL COMMISSION
RALEIGH, NORTH CAROLINA

AFFIDAVIT OF SHUTING WANG

I, Shuting Wang, being duly sworn, do depose and say:

1. I am over eighteen years old, and I make this affidavit upon personal knowledge.
2. On June 26, 2015, Zijie Yan and I were married. See Marriage Certificate, Exhibit 1.
3. Zijie and I remained married until his death on August 28, 2023. See Death Certificate, Exhibit 2.
4. At the time of Zijie's death I had committed no act described in § 31A-1, and am not otherwise disqualified from receiving property by intestate succession.
5. Zijie and I had two natural children together, [REDACTED] and [REDACTED]. See Exhibit 3, Birth Certificates.
6. Other than [REDACTED] and [REDACTED] Zijie Yan had no other children during his lifetime.
7. Zijie died intestate and I am the duly qualified administrator of his estate. See Exhibit 4, Letter of Administration.

This 24th day of April, 2025.

[REDACTED]
SHUTING WANG

Sworn to and subscribed before me

this the 24th day of April, 2025.

John M. Perna
Notary Public

My Commission Expires: February 8, 2030
(Notary Seal)

JOHN M. PERNA
NOTARY PUBLIC
Wake County, North Carolina
My Commission Expires February 8, 2030

EXHIBIT 1

CERTIFICATION OF MARRIAGE

LICENSE NUMBER: [REDACTED]

BETWEEN

GROOM'S NAME: ZIJIE YAN

AGE: [REDACTED]

AND

BRIDE'S NAME: SHUTING WANG

AGE: [REDACTED]

ON

DATE OF MARRIAGE: [REDACTED]

WERE UNITED IN MARRIAGE IN THE COUNTY OF COOK, AND STATE OF ILLINOIS
IN A CIVIL CEREMONY

BY

NAME: BEATRIZ SANTIAGO

OFFICIANT TITLE: JUDGE

AT

CITY OF CEREMONY: CHICAGO, ILLINOIS

DATE RECORDED: JUNE 26, 2015

APPLICATION DATE: MAY 28, 2015

This is to certify that this is a true and correct abstract from the official
record filed with the office of the Cook County Clerk.

7/10/2015 11:16

3547835



County of Cook
State of Illinois

Office of County Clerk
David Orr

David Orr
DAVID ORR COUNTY CLERK



This copy is not valid unless displaying embossed seals of Cook County and County Clerk signature.

VOID WITHOUT WATERMARK OR IF ALTERED OR ERASED

EXHIBIT 2

OFFICE OF REGISTER OF DEEDS

Book 76

Page 2428

CERTIFICATE OF DEATH

NORTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES
N.C. VITAL RECORDS

STATE FILE NO.

[illegible]

EXHIBIT 3

Recorded District
4429
Register Number
310

New York State Department of Health

CERTIFICATE OF LIVE BIRTH

State File Number:



131-2016-00067725

INFANT	1A. Name: First		Middle		Last	
	2A. Date of Birth:		2B. Hour:		3. Sex:	
	8:43 AM		4A. Birth Is:		4B. If Not Single, Birth Is:	
	Single					
	5. Place of Birth:		6A. Facility Name: (Address, if Place of Birth is Other than Hospital / Birthing Center)			
Hospital		Canton-Potsdam Hospital				
6B. Locality of Birth:		6C. County of Birth:				
Village of Potsdam		St. Lawrence				

MOTHER	7A-1. Name: First		Middle		Current Last Name	
	Shuting				Wang	
	7A-2. Last Name on Birth Certificate:		7B. Date of Birth:		7C. City & State of Birth: (Country, if not U.S.A.)	
	Wang				Shenyang, China	
	8A. Residence, State: (Country, if not U.S.A.)		8B. County: (Terr. or Prov., if not U.S.A.)			
	New York		St. Lawrence			
	8C. Locality:		8D. Inside City/Village Limit?			
Town of Potsdam						
8E. Street and Number of Residence:		8F. Zip Code:				
8G. Mailing Address:		8H. Zip Code:				

FATHER	9A-1. Name: First		Middle		Current Last Name	
	Zijie				Yan	
	9A-2. Last Name on Birth Certificate:		9B. Date of Birth:		9C. City & State of Birth: (Country, if not U.S.A.)	
Yan				Jingmen, China		

ATTENDANT	10A. I certify that the stated information concerning this child is true to the best of my knowledge and belief.		10B. Date Signed:	
	Signature			
	10C. Name of Certifier, if Not Attendant:		Title:	
	10E. Attendant's Name:		Title:	
	DICOBY TATIANA		D.O.	
11A. Registrar Name:		11B. Date Filed:		
Maureen E Gaffney				

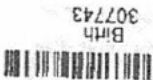
* 12. Information Added or Corrected:	Item No.	Date of Correction	Authorization	Original Information

CERTIFIED COPY

I the undersigned Registrar of Vital Statistics of the
Village of Potsdam do hereby certify that this is a true
Transcript of the Original Certificate filed in this office
at Potsdam

Registrar

STATE OF NORTH CAROLINA
ORANGE COUNTY
OFFICE OF REGISTER OF DEEDS



Birth
307743

Book 92

Page 3441

CERTIFICATE OF LIVE BIRTH

NORTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES
NC VITAL RECORDS

Registration No.	2021000000482	BIRTH NO.	
District No.		DATE OF BIRTH (Month Day Year)	
1. CHILD'S NAME (Last, Middle, First, Suffix)		2. DATE OF BIRTH (Month Day Year)	
3. TIME OF BIRTH		4. SEX	
5. FACILITY NAME (If not institution, give street and number)		6. CITY, TOWN, OR LOCATION OF BIRTH	
7. COUNTY OF BIRTH		8. DATE OF BIRTH (Month Day Year)	
9a. FATHER/PARENT CURRENT LEGAL NAME (First, Middle, Last, Suffix)		9b. BIRTHPLACE (State, Territory, or Foreign Country)	
9a. MOTHER/PARENT CURRENT LEGAL NAME (First, Middle, Last, Suffix)		9b. BIRTHPLACE (State, Territory, or Foreign Country)	
9c. MOTHER/PARENT NAME PRIOR TO FIRST MARRIAGE (First, Middle, Last, Suffix)		9d. BIRTHPLACE (State, Territory, or Foreign Country)	
10a. RESIDENCE OF MOTHER/PARENT - STATE		10b. CITY, TOWN, OR LOCATION	
10c. COUNTY		10d. ZIP CODE	
10d. STREET AND NUMBER		10e. INSIDE CITY LIMITS?	
11. MAILING ADDRESS OF MOTHER/PARENT: ☒ Same as residence, or, State:		City, Town, or Location:	
Street and Number:		Zip Code:	

CHILD

PARENT

PARENT

CERTIFIER

12. CERTIFIER'S NAME: LISA J DENNIS (electronically Certified)	13. DATE CERTIFIED	14. DATE RECD BY LOCAL REGISTRAR
15. DATE NAME ADDED	16. DATE AMENDED	

RACE

17. FATHER/PARENT RACE (Race as identified by parent)	Chinese
18. MOTHER/PARENT RACE (Race as identified by parent)	Chinese

Vital Records
Revised 1/2017

This is to certify that this is a true and correct reproduction or abstract of the official record filed in this office.

Mark Chilton

Register of Deeds
Orange County

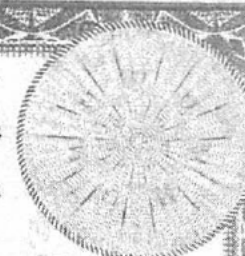
Deputy/Assistant Register of Deeds

By:

, 20

this the day of

Witness my hand and official seal



Any alterations or erasures voids this certificate. Do not accept unless on security paper with Register of Deeds seal clearly embossed in left corner.
ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

EXHIBIT 4

STATE OF NORTH CAROLINA

File No.

23E004956-910

Wake County

In The General Court Of Justice
Superior Court Division
Before The Clerk**IN THE MATTER OF THE ESTATE OF:**

Name

ZIJIE YAN

LETTERS

Administration

G.S. 28A-6-1; 28A-6-3; 28A-11-1; 36C-2-209

The Court in the exercise of its jurisdiction of the probate of wills and the administration of estates, and upon application of the fiduciary, has adjudged legally sufficient the qualification of the fiduciary named below and orders that Letters be issued in the above estate.

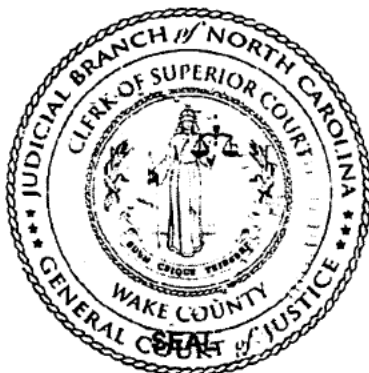
The fiduciary is fully authorized by the laws of North Carolina to receive and administer all of the assets belonging to the estate, and these Letters are issued to attest to that authority and to certify that it is now in full force and effect.

Witness my hand and the Seal of the Superior Court.

Name, Address, And Title Of Fiduciary/Fiduciaries

Shuting Wang

Administrator

CLERK OF SUPERIOR COURT
WAKE COUNTY

Date Of Qualification

9/20/2023

Clerk Of Superior Court

F BLAIR WILLIAMS

EX OFFICIO JUDGE OF PROBATE

Date Of Issuance

09/20/2023

Signature

9/20/2023 12:11:35 PM



Deputy CSC



Assistant CSC



Clerk Of Superior Court

NOTE: This letter is not valid without the official seal of the Clerk of Superior Court.

NORTH CAROLINA INDUSTRIAL COMMISSION
I.C. FILE NUMBER TA-032531

SHUTING WANG, Individually and as	)
Administrator of the ESTATE OF ZIJIE	)
YAN,	)
	)
Plaintiff,	)
	)
v.	)
	)
STATE OF NORTH CAROLINA and	)
UNIVERSITY OF NORTH CAROLINA	)
AT CHAPEL HILL,	)
	)
Defendants.	)

NOTICE OF VOLUNTARY DISMISSAL

Plaintiff gives notice of voluntary dismissal with prejudice as to all Defendants in this matter.

This the 26th day of June, 2025.

ABRAMS & ABRAMS, P.A.

/s/ Douglas B. Abrams
Douglas B. Abrams, State Bar No. 8621
1526 Glenwood Avenue
Raleigh, NC 27608
Telephone: (919) 755-9166
Facsimile: (919) 755-9396
dabrams@abramslawfirm.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that I have served the forgoing *NOTICE OF VOLUNTARY DISMISSAL* upon each of the parties in this lawsuit by email to:

Elizabeth B. Jenkins
Special Deputy Attorney General
ejenkins@ncdoj.gov
Counsel for Defendants

Michael Bertics
mwb@ncdisability.com
Counsel for [REDACTED] *and* [REDACTED]

Kevin Bunn
[REDACTED]
Guardian ad Litem for Minors [REDACTED] *and* [REDACTED]

This the 26th day of June, 2025.

ABRAMS & ABRAMS, P.A.

/s/ Douglas B. Abrams
Douglas B. Abrams, State Bar No. 8621
1526 Glenwood Avenue
Raleigh, NC 27608
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Counsel for Plaintiff