

**PRIVILEGED AND CONFIDENTIAL
FOR SETTLEMENT PURPOSES ONLY PURSUANT TO [INSERT STATE/FEDERAL
RULE, E.G., FRE 408]**

[Date]

[Name of Recipient/Legal Counsel]

[Title]

[Company Name]

[Address]

[City, State, Zip]

Re: Notice of Legal Claims and Settlement Demand of [Client Name]

Dear [Name],

This office represents [Client Name], the [Title] of [Company Name]. We are writing to formally notify you of serious legal claims involving sexual harassment, a hostile work environment, and [Retaliation/Constructive Discharge] perpetrated by [Name of Accused/Executive].

Factual Background

[Client Name] joined the company in [Year] and has maintained an exemplary performance record. However, during [his/her/their] tenure, [he/she/they] was subjected to a continuous pattern of unwelcome sexual advances and discriminatory conduct. Specifically:

- [Date/Event]: [Detailed description of incident].
- [Date/Event]: [Detailed description of incident].
- [Date/Event]: [Description of internal reporting and company failure to act].

Legal Claims

The conduct described above constitutes a clear violation of Title VII of the Civil Rights Act of 1964 and [State Labor/Civil Rights Codes]. The evidence establishes:

1. **Quid Pro Quo Harassment:** Tangible employment actions were conditioned on sexual favors.
2. **Hostile Work Environment:** The conduct was pervasive, severe, and altered the conditions of employment.
3. **Retaliation:** After reporting the conduct, my client suffered [Loss of bonuses, demotion, etc.].

Damages

As a direct result of the company's actions, [Client Name] has suffered significant economic damages, including lost compensation, equity vesting, and benefits, as well as severe emotional distress and damage to [his/her/their] professional reputation within the industry.

Settlement Demand

While [Client Name] is prepared to file a formal charge with the EEOC and proceed to litigation, we believe an amicable resolution is in the best interest of both parties. To avoid the public filing of a complaint, [Client Name] proposes a total settlement of **\$[Amount]**, representing:

- [Number] months of severance/back pay;
- Accelerated vesting of [Number] restricted stock units (RSUs);
- A neutral reference and non-disparagement agreement;
- Reimbursement of reasonable attorney's fees.

Conclusion

This offer remains open until [Time] on [Date]. If we do not reach an agreement in principle by this time, we will proceed with all available legal remedies. We look forward to your prompt response.

Sincerely,

[Your Name/Law Firm Name]

[Phone Number]

[Email Address]