

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

[Date]

[Employer Representative Name]

[Company Name]

[Address]

[City, State, Zip Code]

RE: Notice of Claims and Formal Demand for Settlement Regarding [Client Name]

Dear [Name],

Please be advised that this office represents [Client Name] regarding [his/her/their] employment with [Company Name] and the unlawful sexual harassment [he/she/they] suffered during [his/her/their] tenure. This letter serves as a formal notice of legal claims and a proposal for private mediation and settlement before the commencement of formal litigation.

Factual Summary

[Insert a chronological summary of the harassment. Include specific dates, names of harassers, specific comments or actions, and details of any reports made to HR or management.]

Legal Claims

Based on the facts above, [Client Name] possesses strong legal claims against [Company Name], including but not limited to:

- Hostile Work Environment in violation of [Title VII of the Civil Rights Act / State Law]
- Quid Pro Quo Sexual Harassment
- Retaliation for reporting harassment
- Failure to Prevent Harassment
- [Insert other applicable claims, e.g., Intentional Infliction of Emotional Distress]

Damages

As a direct result of the conduct described above, [Client Name] has suffered significant damages, including:

- Lost wages and benefits (Back pay and Front pay)
- Emotional distress and mental anguish
- Physical manifestations of stress
- Attorneys' fees and legal costs

Settlement Demand

While [Client Name] is prepared to file a formal complaint with the [EEOC/State Agency] and proceed to a jury trial, [he/she/they] is willing to resolve this matter at this time to avoid the expense and publicity of litigation. [Client Name] proposes the following terms for a global settlement:

1. A monetary payment of \$[Amount];
2. [Optional: Mutual non-disparagement agreement];
3. [Optional: Neutral reference for future employment];
4. [Optional: Agreement to participate in private mediation].

This offer remains open until [Date/Time]. If we do not receive a response by that time, we will proceed with the filing of all applicable legal claims.

Sincerely,

[Your Name/Law Firm Name]

[Phone Number]

[Email Address]