

[Your Name/Law Firm]

[Address]

[City, State, Zip Code]

[Email Address]

[Phone Number]

[Date]

VIA [Email/Certified Mail]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

RE: SETTLEMENT COMMUNICATION - FOR SETTLEMENT PURPOSES ONLY

Claimant: [Client Name]

Respondent: [Company Name]

Matter: Misclassification Claim under [State/Federal Law]

Dear [Opposing Counsel Name],

As you are aware, this firm represents [Client Name] regarding their claims for worker misclassification during their engagement with [Company Name] from [Start Date] to [End Date]. Our investigation indicates that [Client Name] was improperly classified as an independent contractor when, under the [Economic Realities/ABC Test], they functioned as an employee.

Based on our calculation of unpaid overtime, liquidated damages, [unreimbursed business expenses], and statutory penalties, we estimate the total exposure to your client exceeds \$[Amount].

In the interest of resolving this matter efficiently and avoiding the costs of formal litigation, my client is prepared to settle all outstanding claims for a total payment of **[\$Settlement Amount]**.

This settlement offer is inclusive of:

- Back wages and overtime pay
- Liquidated damages
- Statutory penalties for wage statement violations
- Reasonable attorney's fees and costs

This offer is contingent upon the execution of a standard settlement agreement, including a general release of claims and a confidentiality provision. This offer remains open until [Time] on [Date], after which it will be withdrawn, and we will proceed with [filing a formal complaint/administrative hearing].

We look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]

[Title/Law Firm]