

**CONFIDENTIAL SETTLEMENT COMMUNICATION FOR SETTLEMENT PURPOSES ONLY**

[Date]

[Recipient Name]

[Recipient Law Firm/Company]

[Address Line 1]

[City, State, Zip Code]

**Re: [Plaintiff Name] v. [Defendant Name]**

**Case No.: [Case Number, if applicable]**

**Subject: Settlement Offer Regarding ADA Accessibility Claim**

Dear [Recipient Name],

This letter is in response to the complaint/notice dated [Date of Complaint] regarding alleged accessibility barriers at [Property Address/Website URL] under the Americans with Disabilities Act (ADA).

While [Defendant Name] denies any liability or violation of the ADA, we are interested in resolving this matter efficiently to avoid the costs and uncertainties of protracted litigation. Accordingly, we propose the following terms for a full and final settlement:

1. **Remediation of Alleged Barriers:** [Defendant Name] agrees to modify or repair the following items to comply with ADA Standards for Accessible Design: [List specific items, e.g., parking spaces, ramp slopes, counter heights] within [Number] months of signing the settlement agreement.
2. **Monetary Payment:** [Defendant Name] shall pay a total sum of \$[Amount] to [Plaintiff Name/Law Firm]. This amount is inclusive of all damages, costs, and attorney's fees.
3. **Release of Liability:** In exchange for the above, [Plaintiff Name] will provide a full release of all claims, known or unknown, related to the accessibility of the subject property/website up to the date of the agreement.
4. **Dismissal:** Upon receipt of the settlement payment, [Plaintiff Name] will file a Stipulation of Dismissal with Prejudice for the entire action.

This offer is contingent upon the execution of a formal Settlement Agreement containing standard confidentiality and non-disparagement clauses.

This offer will remain open until [Time] on [Date]. We look forward to your response.

Sincerely,

[Your Name/Signature]

[Your Title/Company]

[Phone Number]  
[Email Address]