

[Your Name or Company Name]  
[Your Address]  
[City, State, Zip Code]  
[Your Phone Number]  
[Your Email]

[Date]

[Plaintiff's Attorney Name]  
[Law Firm Name]  
[Address]  
[City, State, Zip Code]

**RE: SETTLEMENT COUNTEROFFER**

**Case Name:** [Plaintiff Name] v. [Your Company Name]

**Case Number:** [Case Number, if applicable]

Dear [Attorney Last Name],

I am writing in response to your settlement demand dated [Date of Demand Letter] regarding the alleged Americans with Disabilities Act (ADA) violations at [Property Address/Website URL].

While [Your Company Name] remains committed to ensuring accessibility for all individuals, we find your initial demand of \$[Original Demand Amount] to be excessive given the circumstances. We wish to resolve this matter efficiently without the need for protracted litigation.

Accordingly, we propose the following counteroffer for a full and final release of all claims:

- **Monetary Payment:** A total sum of \$[Your Counteroffer Amount] to cover all damages, attorney's fees, and costs.
- **Remediation:** [Your Company Name] agrees to remedy the specific alleged barriers identified in your complaint by [Date/Timeline], subject to obtaining any necessary local permits.
- **Release of Liability:** A comprehensive settlement agreement and a full release of all claims (known and unknown) against [Your Company Name] and its affiliates.

We believe this proposal is fair and reflects a good-faith effort to resolve this dispute. This offer is made for settlement purposes only and is subject to Federal Rule of Evidence 408 and any applicable state counterparts.

Please let us know your response by [Date for Deadline]. We look forward to hearing from you.

Sincerely,

[Your Signature]

[Your Printed Name]  
[Your Title]