

**PRIVILEGED AND CONFIDENTIAL
FOR SETTLEMENT PURPOSES ONLY**

[Date]

[Opposing Counsel Name]
[Law Firm Name]
[Address]
[City, State, Zip]

Re: [Plaintiff Name] v. [Defendant Name]
Case No.: [Case Number]
Subject: Settlement Offer Regarding Statutory Attorney's Fees and Costs

Dear [Counsel Name],

Following the resolution of the injunctive relief portion of this matter, this letter serves as a formal proposal to settle the outstanding issue of Plaintiff's attorney's fees, expert witness fees, and litigation costs pursuant to 42 U.S.C. § 12205.

As the prevailing party, Plaintiff is entitled to recover reasonable fees and costs. To avoid the additional expense of formal motion practice, Plaintiff offers to settle all claims for fees and costs for the total sum of \$[Amount].

This figure is based on the following breakdown:

- **Attorney's Fees:** \$[Amount] ([Number] hours at \$[Rate]/hr)
- **Paralegal Fees:** \$[Amount] ([Number] hours at \$[Rate]/hr)
- **Filing Fees & Service of Process:** \$[Amount]
- **Expert Site Inspection/Report:** \$[Amount]

We believe this offer is reasonable and reflects the market rates for ADA Title III litigation in this jurisdiction. Attached please find our billing logs and expense receipts for your review.

This offer shall remain open until [Time] on [Date], at which point it will be withdrawn. If we are unable to reach an agreement by this time, we will proceed with filing a formal Motion for Attorney's Fees with the Court, which will include a request for the additional time spent on the motion itself.

We look forward to your prompt response.

Sincerely,

[Your Name]
[Your Law Firm]

[Your Phone Number]

[Your Email]