

**Date:** [Insert Date]

**VIA:** [Insert Method of Delivery, e.g., Certified Mail / Email]

**TO:**

[Name of Contact Person/Legal Counsel]

[Company Name]

[Street Address]

[City, State, Zip Code]

**RE: NOTICE OF BREACH OF SETTLEMENT AGREEMENT**

Dear [Name of Contact Person],

This letter serves as formal notice that [Company Name] is in breach of the Settlement Agreement effective as of [Date of Agreement] (the "Agreement") regarding Americans with Disabilities Act (ADA) accessibility claims for [Property Name/Website URL].

Pursuant to Section [Insert Section Number] of the Agreement, [Company Name] agreed to complete the following modifications or actions by [Deadline Date]:

- [Describe Breach 1, e.g., Installation of van-accessible parking signage]
- [Describe Breach 2, e.g., Remediation of website screen reader compatibility]
- [Describe Breach 3, e.g., Modification of service counter height]

As of the date of this letter, these actions have not been completed, or have been completed in a manner that does not comply with the ADA Standards for Accessible Design specified in the Agreement.

This breach must be cured within [Number] days of your receipt of this notice. Please provide written confirmation and photographic or digital evidence of the completed remediation by [Deadline Date].

Failure to cure this breach within the specified timeframe will result in [Insert Consequence, e.g., the filing of a motion to enforce the settlement / initiation of further legal action] without further notice. We reserve all rights and remedies available under the Agreement and applicable law.

Sincerely,

[Your Signature]

[Your Printed Name]

[Your Title/Organization]

[Your Phone Number]

[Your Email Address]

**CC:** [Name of Attorney/Co-Counsel]