

DATE: [Insert Date]

TO: [Tax Counsel Name]
[Law Firm/Consultancy Name]
[Address]

FROM: [Lead Litigation Attorney Name]
[Law Firm Name]

RE: Tax Advisory Services regarding [Case Name/Matter Number]

Dear [Tax Counsel Name],

We represent [Client Name] in an ongoing civil litigation matter against [Opposing Party Name] regarding [Brief Description of Dispute, e.g., Breach of Contract/Employment Settlement].

We are requesting a formal legal opinion and advisory services regarding the tax implications of the potential outcomes of this litigation. Specifically, please provide guidance on the following:

- The characterization of damages (e.g., ordinary income, capital gains, or non-taxable compensatory damages).
- The taxability of the proposed settlement structure dated [Date].
- The deductibility of legal fees and court costs incurred by the Client.
- Applicable withholding requirements and IRS reporting obligations (Forms 1099 or W-2).

Enclosed for your review are the following documents:

- Current Complaint/Petition
- Draft Settlement Agreement
- [List other relevant financial documents]

Please provide your initial analysis by [Insert Date]. If you require further documentation or a briefing call, please contact my office at [Phone Number].

We look forward to your counsel on this matter.

Sincerely,

[Signature]
[Printed Name]
[Title]