

Instruction: This is a model letter. Adapt to fit your facts and circumstances.

D A T E

VIA FAX

N A M E
C O M P A N Y
A D D R E S S L I N E
C I T Y , S T A T E Z I P C O D E

Re: **vs.**
 Adversary No.

Dear :

My client has authorized me to make the following settlement offer in connection with the above referenced matter:

My client will agree to the entry of an order by setting aside the relevant tax deed and providing that the have a period of sixty (60) days in which to redeem the tax sale by paying the Chancery Clerk all amounts due. According to our calculations the redemption amount will be approximately \$, plus a 1% redemption fee to the Chancery Clerk, if redeemed and \$, plus a 1% redemption fee to the Chancery Clerk, if redeemed by . Upon redemption, my client will be entitled to have the Chancery Clerk refund directly to it the \$ overbid. In addition, my client will retain all monies paid to it under the Plan through the date of the tax sale redemption. Upon redemption, my client's proof of claim will be withdrawn and no further monies would be due to my client under the Plan. Also, upon entry of the Agreed Order by the Bankruptcy Court, the would pay directly to my client the sum of \$ for attorney fees incurred in connection with this matter. Finally, the Order will provide that if the fail to redeem within the sixty (60) day redemption period, (i) my client will be entitled to a new tax deed, (ii) the will waive any right to contest the validity of the tax sale or the issuance of said tax deed, and (iii) the will surrender the property to my client.

Obviously, this settlement offer is conditioned upon the agreement and consent of the Trustee and the Bankruptcy Court to all of the forgoing terms, including the retention by my client of all funds previously paid to it under the Plan, and the preparation of an acceptable order. Moreover, this offer is solely for settlement purpose and is not an admission of any nature by my client nor shall it be admissible into evidence in any proceeding.

Please convey this offer to your clients and let me know their response.

Sincerely,

BY:

/
Enclosure
pc: