

Dear _____,

I met with my client, Mr. _____, this morning and we are prepared to discuss settlement of this case.

It would appear that there are slightly greater than \$ _____ in medical expenses attributable to this accident. In addition, following his shoulder surgery, Mr. _____ missed ____ days from work for lost wages of approximately \$_____. Mr. _____ also missed additional days from work but has yet to provide me with the precise dates for me to forward to you. Therefore, it would appear that the case presently involves approximately \$_____ in special damages.

Additionally, Mr. _____ advised me this morning that he continues to experience problems with his neck and shoulder and intends to seek additional neurological treatment. Thus, additional medical expenses are anticipated.

In an effort to resolve all issues involved in this case, Mr. _____ has agreed to extend the following settlement offer: Mr. _____ will accept in settlement of his claim against _____ for the lesser of \$_____ or the limits of his liability coverage. In the negligent entrustment claim against _____, Mr. _____ is willing to settle that claim for the sum of \$_____.

I ask that you pass this offer along to your client and also ask that you respond prior to the summary judgment hearing on the _____ day of _____, 20____. I would also point out that in the event Judge _____ grants the summary judgment in favor of _____, your client will be liable for all court costs and fees as well. I anticipate such judgment. I trust that we can resolve this case at this point as it involves

clear liability against _____ and the only real dispute involves liability of _____ under the negligent entrustment claim. I look forward to hearing from you shortly.

Sincerely,
