


TREVETT CRISTO
ATTORNEYS

HON. ROBERT J. LUNN
SUPREME COURT JUSTICE (RET.)
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October 27, 2015

Dear Counselors:

I would like to thank you for your participation in the mediation which was conducted and finalized on October 26, 2015, before the undersigned.

This will confirm final settlement of the above case upon the following terms:

1. A monetary settlement in the amount of _____ be paid by Defendant's to Plaintiff's attorney in full settlement of the pending claim. Plaintiff and his attorney reserve the right to structure any part of the _____ settlement.
2. Plaintiff is to execute a full General Release to be approved by Defendant's attorney.
3. A Stipulation of Discontinuance on the merits in a form acceptable to the Defendant's attorney to be executed by all parties.
4. The parties shall enter into a confidentiality agreement to be drafted by defendant's counsel, upon terms to be mutually agreed upon by both attorneys.
5. The plaintiff agrees to provide defendant with information as to whether there is a Medicare, Medicaid or other lien and plaintiff agrees to be solely responsible and agrees to indemnify defendant and defendant's insurance carrier for any outstanding liens asserted against the settlement.

Enclosed for your file is an executed copy of the Mediated Settlement Agreement.

This successfully concludes the matter, but I want to once again extend my appreciation and thanks to each of you for your work and good faith negotiation in successfully getting the case settled.

Finally, I am enclosing my invoice in the amount of _____ along with a copy of our W-9. *Please see the invoice itself for the amount of your share of the fee due, unless other arrangements have been made.* My firm's Tax I.D. Number is 16-1278314. If you would like to have any part of your submissions returned to you, please advise and I will make them available to you with our receptionist at the front desk; otherwise we will shred those documents within fifteen (15) days hereof.

Should you have any questions, please feel free to contact me at any time. Thank you for giving me the opportunity to act as a mediator with respect to this pending litigation.

Best regards,

TREVETT CRISTO SALZER & ANDOLINA P.C.



Hon. Robert J. Lunn
Supreme Court Justice (RET.)

RJL:dm
Enclosures