

May 12, 2016

RE: Doe 1005 vs Johnson et al.

Dear Mr.-----

You have recently been emailed the Summons and Complaint. Thank you for returning the Acknowledgment of Service.

As you are aware, the statute of limitations is running in May so we do not have a lot of time. May this serve as a good faith attempt to enter into settlement negotiations before the Complaint is filed and we go further in the case.

All of this discussion is based upon the information that we have received that there is no insurance policy on this case. I would request that the defendant make one more attempt to find any policies that may exist for the bar or for their own homeowner's policy during this time period and would notify the defendant that this settlement discussion is null and void if a policy is found.

Based upon the understanding that there is no policy available, Plaintiff submits the following: ---client--- was sexually abused by ---defendant--- when she was a minor.

- 1.
2. She was an employee at Tootie's Bar at the time where he worked. We have various witnesses that will come forward to verify that she worked there.
3. Some of the instances are horrific considering her tender age of 13. There are graphic examples of him sexually abusing her in her house as she

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worked for them as a nanny, in cars as he drove her from work to and from other activities, and at the actual bar itself. ---client--- tells of a time that he was washing dishes and would have her underneath the counter giving him oral sex during business hours. There are many instances of him providing alcohol and drugs and sexually abusing her at the bar.

All of this took place when she was too young to consent. She was a young girl being taken advantage of by someone who seemed to care for her. She was groomed by ---defendant---, which led to her participation in various disturbing sexual acts.

In a good faith attempt to get this settled, the plaintiff would accept \$90,000 as a full and final settlement and release of all claims if a deal can be worked out in the next couple weeks.

I look forward to hearing back from you.

Very truly yours,

Michael A. Bryant

MAB\slb