

Theresa V. Johnson Attorney at Law

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CONFIDENTIAL SETTLEMENT DEMAND

Letter Sent by Facsimile, Email and U.S. Standard Mail

November 7, 2011

Mr. Kevin B. Duff Rachlis Durham Duff & Adler, LLC 542 South Dearborn, Suite 900 Chicago, Illinois 60605

Tel: (312) 733-3950 Fax: (312) 733-3952

Re:

Christopher S. Cynowa v. CSSS, Inc., Lisa Wolford and Bill Slater

Case No.: 08 L 403

Subject:

Settlement Clarification and Correction

Dear Mr. Duff:

This is to clarify and correct our settlement demand of October 21, 2011.

Mr. Cynowa demands \$250,000.00 (two hundred fifty thousand dollars), a clean personnel file, including allowing Mr. Cynowa to resign, and a letter of recommendation from CSSS, Inc.

We request that your clients provide us with a counter to our demand within ten (10) calendar days, i.e., by EBD November 17, 2011. If your clients decide not to make a counter-offer we will assume that they do not intend to engage in good faith settlement negotiations and this demand will be withdrawn.

Regarding the settlement conference with Judge Maras, please confirm no later than November 13, 2011 that both defendants will appear in person at this conference. If either Ms. Wolford or Mr. Slater will not appear in person, neither will Mr. Cynowa. If either Ms. Wolford or Mr. Slater, leave the conference we will consider the conference terminated and we will also leave.

If the defendants are relying on a policy of insurance to fund a settlement, we request that an insurance company representative be present at the settlement conference. We also request that

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this insurance company representative have authority to settle of at least \$250,000.00. This does not mean that this is a final figure, but we want to avoid the situation where the representative has to go up the ladder for authority. If an insurance company representative does not have this amount of authority we will assume the defendants do not want to participate in good faith and consider the conference terminated.

During the settlement conference, we will respond to any offer made by Defendants within 10 minutes. We expect the Defendants to likewise respond to any demand made by us within 10 minutes. If the defendants fail to do so, we will consider the settlement conference terminated.

Sincerely,

Theresa V. Johnson

Copy to:

Mr. Peter Bustamante

Mr. Christopher S. Cynowa