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September 15, 2011

Henry L. Rigali, Esq.
78 Maple Street
Springfield, MA 01105-1813

FOR SETTLEMENT PURPOSES ONLY

**Re: Johnson v. Frei
Civil action No. 1143 CV 293**

Dear Mr. Rigali:

This letter shall respond to your correspondence dated August 31, 2011 regarding the above-referenced matter. As a preliminary matter, based in part on the testimony of Peter Frei during several days of hearing in the matter of Frei v. Johnson, Docket No. 1143 RO 79, it is our position that the counterclaims asserted by your client against my client are baseless and without merit.

Despite the fact that there is no merit to the counterclaims, Mr. Johnson is willing to settle all claims and counterclaims asserted in this matter in order to avoid the expense of litigation.

In addition to a dismissal of the complaint and counterclaims, Mr. Johnson is seeking the following:

- payment of all legal fees incurred to date by Mr. Johnson in the above-referenced matter and the matter of Frei v. Johnson, Docket No. 1143 RO 79;
- a restraining order issued by a court of competent jurisdiction restraining Mr. Frei from having any contact with Mr. or Mrs. Johnson and their respective families, including but not limited to the filing of any new complaints;
- emotional distress damages in the amount of \$5,000.00; and

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- the withdrawal of any charges/complaints by Mr. Frei against Mr. Alex Haney.

This settlement offer will be rescinded if not accepted by September 23, 2011, time being of the essence.

Very truly yours,



Tani E. Sapirstein

cc: Brian Johnson

TES:cdh