

Gonzalez as the sole owner of the property. Written discovery was exchanged between the parties and the condemnation is currently pending trial.

In August 2014 defendant presented a settlement demand for \$99,495.00 (less the \$27,080.00 already deposited) and outlined several damage and valuation issues, including updated costs for replacement of certain improvements impacted by the taking. An informal settlement conference was held in September 2014 attended by counsel for both parties, appraiser Leonel Garza, III, and yourself. As a result of that conference, Leonel Garza agreed to review, update and revise his appraisal. The updated appraisal, a copy of which is attached, was concluded on December 22, 2014, and included an updated value of \$52,747.00, representing a difference of \$25,667.00 above the \$27,080.00 value listed in the prior appraisal, which was the amount of the registry deposit pursuant to the Award of the Special Commissioners. Following his review of the appraisal, Marcus Barrera, on behalf of defendant, agreed to accept the total amount of \$52,747.00 to settle and conclude this matter.

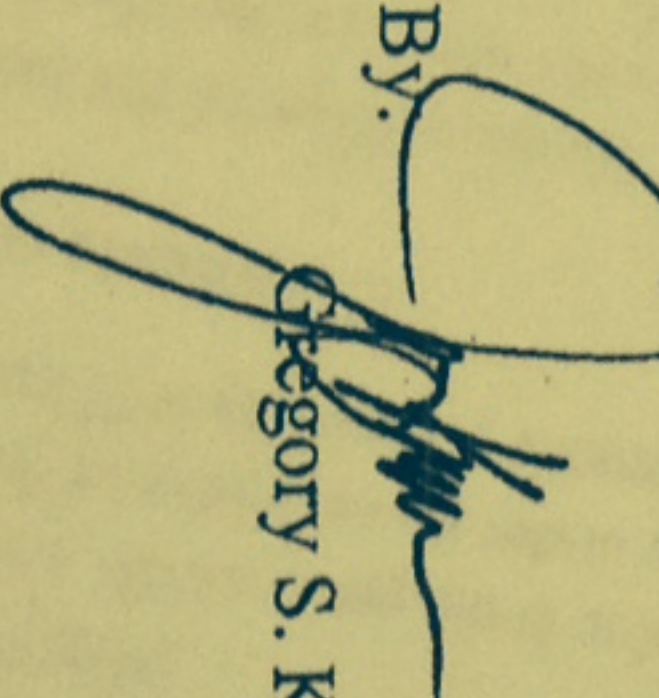
In light of the anticipated expense of continuing discovery, defendant's damage claims, pretrial hearings, and the uncertainty of a potentially prolonged jury trial, acceptance of defendant's offer to accept \$52,747.00 in settlement would likely be in the best economic interest of all parties. Please let us know if the County agrees to such offer. If so, we will proceed with the preparation of an agreed judgment and release of lis pendens pending receipt of the additional \$25,667.00 in settlement funds for deposit into the registry.

Let me know if you have any questions or need any additional information. Thank you.

Very truly yours,

ATLAS, HALL & RODRIGUEZ, LLP

By:

  
Gregory S. Kazen

GSK/ybo

Enclosure: Updated Appraisal