

Sheets & Crossfield, PLLC

ATTORNEYS AT LAW

309 East Main Street • Round Rock, TX 78664-5246

Phone 512-738-8732 (D) • fax 512-255-8986

mylan@scrrlaw.com

August 19, 2021

RULE 11 CONDEMNATION SETTLEMENT AGREEMENT

Via e-mail clough@barronadler.com

Chris Clough

Barron, Adler, Clough & Oddo, LLP

808 Nueces Street

Austin, Texas 78701

(512) 478-4995

(512) 478-6022 (Fax)

Re: Williamson County—Southeast Loop

Cause No. 21-0720-CC4; *Wilco v. William A. Rogers, Jr. as the Trustee of the
Tiffany Tankersely Wolfe 1997 Children's Trust*

Parcel No.: 26

Dear Chris:

Please allow this letter to constitute a Rule 11 Settlement Agreement between Williamson County, Texas ("County") and William A. Rogers, Jr. as the Trustee of the Tiffany Tankersely Wolfe 1997 Children's Trust ("your clients") in connection with the project identified herein and the fee simple right of way parcel interest to be acquired as part of the Southeast Loop Corridor road improvement project. The terms of this Agreement and the settlement reached are follows:

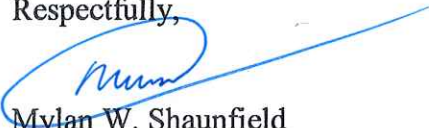
1. County agrees to pay, and your clients agree to accept, the total sum of Two Million Three Hundred Thousand and No/100 Dollars (**\$2,300,000**) in compensation to the Condemnees in the above referenced lawsuit for the acquisition of 39.849 acres sought to be acquired, and any damages to the remaining property of your clients not acquired, with such location and acquisition as further described in County's current pleading on file in this case.

The parties agree that an Agreed Special Commissioners Award in this amount shall be entered by the appointed commissioners at the hearing currently scheduled for August 24, 2021.

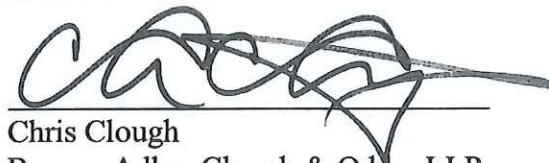
2. Your clients acknowledge \$1,530,268 was already paid to them, leaving a balance due of \$769,732.
3. It is agreed that all provisions of the fully executed PUA from July 13, 2021, attached hereto as Exhibit "A," are incorporated within this agreement.
4. It is agreed that neither County nor your clients will file objections to the Award of Special Commissioners in this cause so long as the Williamson County Commissioners Court approves the \$2,300,000 settlement amount on August 31, 2021.
5. Subject to Williamson County Commissioner Court approval of this agreement, County agrees to deposit the remaining \$769,732 within the court's registry by September 28, 2021.

If this letter correctly sets forth the terms of our Rule 11 agreement and the settlement reached between the County and your clients, please so indicate by having the appropriate person execute this letter in the space indicated below on behalf of your clients.

Respectfully,


Mylan W. Shaunfield
Sheets & Crossfield, PLLC
Attorneys for County

AGREED AND ACCEPTED:



Chris Clough
Barron, Adler, Clough & Oddo, LLP
Attorneys for William A. Rogers, Jr. as the Trustee of the Tiffany Tankersely Wolfe 1997
Children's Trust
Date: 8/19/21

AGREED AND ACCEPTED:

WILLIAMSON COUNTY, TEXAS

By: _____
Bill Gravell, Jr.
County Judge
Date: _____