

# Sheets & Crossfield, PLLC

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September 14, 2023

## RULE 11 CONDEMNATION SETTLEMENT AGREEMENT

Via e-mail david@davidtoddllaw.com

ROSA AND PEDRO AGUADO

c/o David Todd

Todd Law Firm

Re: Williamson County – County Road 332, Parcels 4 & 5  
Cause No. 22-0763-CC2  
Williamson County, Texas v. Rosa Aguado and Pedro Aguado

Dear Mr. Todd:


In follow up to our recent correspondence, this letter is a Rule 11 Settlement Agreement between WILLIAMSON COUNTY, TEXAS (“County”) and ROSA AGUADO AND PEDRO AGUADO (“Owner”) in connection with the project identified herein and the permanent easement to be acquired as part of County’s County Road 332 road expansion and utility facilities project (the “Project”). The terms of this Agreement and the settlement reached are as follows:

1. Subject to final approval by the Commissioner’s Court, the County agrees to pay, and Owner agrees to accept, the total sum of ONE HUNDRED NINE THOUSAND SEVENTY and 00/100 Dollars (**\$109,070**) in total compensation to the Owner in the above-referenced lawsuit for the acquisition of the right-of-way, waterline easement, and electric aerial easement interests referenced in County’s petition on file in the above-referenced cause number, and any damages to the remaining property of Owner not acquired (the “Property”), with such location and acquisition as further described in County’s current pleading on file in this case.
2. The parties agree to enter the agreed amount of ONE HUNDRED NINE THOUSAND SEVENTY and 00/100 Dollars (**\$109,070**) (the “Agreed Award”) at the Special Commissioners Hearing designated to take place at 10:00 am on October 31<sup>st</sup>, 2023, at 100 Wilco Way, Suite 225, Georgetown, Texas, in the above-referenced lawsuit. It is further agreed that neither Owner nor County will file objections to the Agreed Award of Special Commissioners. Following the deposit of the Agreed Award into the Registry of the Court, the parties agree to enter a Judgment in the Absence of Objections to dismiss the above-referenced lawsuit. Thereafter, each party agrees to pay their own fees and costs.

If this letter correctly sets forth the terms of our agreement and the settlement reached between County and Owner, please so indicate by having the appropriate persons execute this letter in the space indicated below and return it to my attention. If we need to make alternate arrangements for pickup or collection of the document just let us know that as well.


Sincerely,  
/s/ Adam H. Hill  
Adam H. Hill  
Sheets & Crossfield, PLLC

**AGREED AND ACCEPTED:**  
ROSA AGUADO AND PEDRO AGUADO

By:   
David Todd  
Attorney for Rosa Aguado and Pedro Aguado

Date: 9/21/2023

**AGREED AND ACCEPTED:**  
WILLIAMSON COUNTY, TEXAS

By:   
Adam H. Hill  
Attorney for Williamson County, Texas

Date: 9/21/2023

By: \_\_\_\_\_  
Bill Gravell, Jr.  
County Judge

Date: \_\_\_\_\_