

# Sheets & Crossfield, PLLC

ATTORNEYS AT LAW

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July 19, 2021

## RULE 11 CONDEMNATION SETTLEMENT AGREEMENT

Via e-mail brandys@barronadler.com

Roy Brandys

Barron, Adler, Clough & Oddo, LLP

808 Nueces Street

Austin, Texas 78701

(512) 478-4995

(512) 478-6022 (Fax)

Re: Williamson County—SH29 @ DB Wood Rd  
Cause No. 21-0643-CC3; *Wilco v. C.L. Thomas Holdings, LLC*  
Parcel No.: 2

Dear Roy:

Please allow this letter to constitute a Rule 11 Settlement Agreement between Williamson County, Texas (“County”) and C.L. Thomas Holdings, LLC (“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 County’s SH29 @ DB Wood 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 Three Hundred Fifty Thousand and No/100 Dollars **(\$350,000)** in compensation to the Condemnees in the above referenced lawsuit for the acquisition of .294 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 July 22, 2021.

2. Your clients acknowledge \$132,192 was already paid to them, leaving a balance due of \$217,808.

3. County agrees that as part of the proposed Roadway Construction Project it shall cause to be constructed one (1) driveway connection between the proposed Roadway Construction Project improvements and the remaining property of Grantor. The driveway shall be thirty (30) feet wide or otherwise of standard commercial width and radii as required and allowed by any applicable development rules of the City of Georgetown, and shall be located as near to Grantor's eastern property boundary line as is reasonably feasible as determined by County's design engineers
4. It is agreed that neither County or your clients will file objections to the Award of Special Commissioners in this cause so long as the Williamson County Commissioners Court approves the \$350,000 settlement amount on July 27, 2021.
5. Subject to Williamson County Commissioner Court approval of this agreement, County agrees to deposit the remaining \$217,808 within the court's registry by August 27, 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 the property owners.

Very truly yours,



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

**AGREED AND ACCEPTED:**




Roy Brandys  
Barron, Adler, Clough & Oddo, LLP  
Attorney for C.L. Thomas Holdings, LLC

Date: 7-21-21

**AGREED AND ACCEPTED:**

WILLIAMSON COUNTY, TEXAS

By   
Bill Gravell (Jul 27, 2021 15:56 CDT)

Bill Gravell, Jr.  
County Judge

Date: Jul 27, 2021