

PERSONAL INJURY NEGOTIATION

Defendant's Confidential Information

You know that your client had been drinking on the night in question, but you doubt that this adversely influenced his driving ability. However, you suspect that he was driving too fast under the circumstances. You also realize that Bonde's mind was on his client and wife at the moment it should have been concentrating on the traffic, and you believe that a jury could conclude that he had driven negligently.

You have learned of the excellent reputation which Helmsley has in the community, and you have been led to believe that her paralysis has caused her husband to sue for dissolution after 15 years of apparently blissful marriage. You have discovered from investigation that Helmsley had visited a bar with one of her male associates prior to the time she had boarded the trolley, but she has stated that she had only stopped off after work to help celebrate his birthday. She has denied any heavy drinking. Although you believe that she had been out quite late to have merely been engaged in a friendly birthday celebration, you have no hard evidence to refute Helmsley's story.

Your client is **extremely worried** about the effect which any adverse publicity could have on his business, and he would like to settle the case as soon as possible. (Bonde is self-insured, thus you need not concern yourself with any insurance carrier considerations.) He believes that he will have to pay Helmsley at least \$500,000 and has authorized you to pay as much as \$1,500,000, if necessary. "Just get this taken care of."