

PERSONAL INJURY NEGOTIATION

Plaintiff's Confidential Information

You are aware that on the night of the accident, Helmsley had been drinking heavily at a bar with a favorite male associate from her office. She had not intended to leave the trolley where she did, but in her intoxicated state she had wandered into the street and slipped on the wet pavement into the path of Bonde's automobile. Nevertheless, you have located an apparently reliable witness who is positive that Bonde was speeding and swerving sharply at the moment he struck Helmsley. You have suspicions that Bonde may have consumed several drinks too many before he commenced his drive home, but you have not been able to substantiate this fact.

You have been informed that, after 15 years of marriage, Mr. Helmsley had been planning to dissolve his marriage prior to the accident due to his wife's extra-marital affairs, and you know that her injury did not precipitate this action. In fact, Helmsley's disability may have precluded his filing for dissolution at an earlier time.

Helmsley, who is reputed to be a solid citizen, is terrified of the adverse consequences which might be caused to her lucrative practice should her clients learn of her drinking and "dating" proclivities. She has thus decided not to press her suit against Bonde to trial. She would like to recover at least \$200,000 to cover her medical expenses and lost earning, and would be pleased to recover any amount above that figure. She is presently earning \$145,000 per year.