

## SETTLEMENT AGREEMENT

**THIS SETTLEMENT AGREEMENT** (the "Agreement") is entered into by [REDACTED], An [REDACTED] Corporation ("[REDACTED]"), [REDACTED], a(n) Massachusetts corporation ("Company"), and [REDACTED] ("Individual"), (collectively, the "Parties").

### RECITALS

**WHEREAS**, the Company, Individual, and [REDACTED] entered into a renewal of an earlier executed Future Receivables Sale Agreement, with the renewal date of [REDACTED] 16, 2019 ("Sale Agreement") whereby [REDACTED] purchased the future receivables of \$125,000.00 for the purchase price of \$173,750.00,

**WHEREAS**, pursuant to the Sale Agreement, the total unpaid Purchased Receivables outstanding amount is \$ 61,536.52; and

**WHEREAS**, in order to resolve any disputes among the Parties, with regard to the Sale Agreement, and to avoid litigation, the Parties agree to the terms of this Agreement.

**NOW, THEREFORE**, in consideration of the recitals set forth above, mutual promises, covenants, releases, and agreements contained in this Agreement, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, and intending to be legally bound hereby, [REDACTED], the Company, and Individual hereby agree as follows:

1. **Settlement**. The Parties hereby settle and compromise all claims (including claims for attorneys' fees and costs), which they have now or may have against one another arising from the Sale Agreements and/or the Pending Litigation. The Company and the Individual agree THAT ONCE THIS Agreement is fully executed by both Parties, that to the Plaintiff shall dismiss with prejudice the filed complaint THAT IS CURRENTLY PENDING before the [REDACTED] County Superior Court under case number [REDACTED] (the "Civil Action").

2. **Payment by Company and Individual**. The Company and Individual agree to pay [REDACTED] the total sum of \$ 30,765.85 ("Settlement Payment") [REDACTED]: