



Thomas Morgan &lt;tom@ibuy423.com&gt;

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**Fw: Demand to settle from Plaintiff**

3 messages

**Robin Flores** <robin@robinfloreslaw.com>

Mon, Dec 22, 2025 at 9:27 AM

To: Thomas Morgan &lt;tom@ibuy423.com&gt;

Here's another counter offer they made today

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**From:** Thomas Hickey <[thickey@spicerfirm.com](mailto:thickey@spicerfirm.com)>**Sent:** Monday, December 22, 2025 10:25:56 AM**To:** Robin Flores <[robin@robinfloreslaw.com](mailto:robin@robinfloreslaw.com)>**Cc:** Julie Bowers <[juliebowers@robinfloreslaw.com](mailto:juliebowers@robinfloreslaw.com)>**Subject:** RE: Demand to settle from Plaintiff

I cannot settle the case for the below demand. However, I can settle the case for a payment of \$25,000 along with a letter of apology. As discussed previously, I cannot agree to an admission of wrongdoing just as I could not if this was a rearend automobile collision. Your client would need to sign a standard release of all claims, which includes language that the settlement is not an admission of liability, and that includes a confidentiality provision along with other standard terms and provisions for a release. The case would also need to be dismissed with prejudice.

Thomas

B. Thomas Hickey, Jr., Member

**SPICER RUDSTROM PLLC**

537 Market Street, Suite 203

Chattanooga, Tennessee 37402

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B. Thomas Hickey Jr.



**Personal Injury Litigation - Defendants**  
Chattanooga, Tennessee

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**From:** Robin Flores <[robin@robinfloreslaw.com](mailto:robin@robinfloreslaw.com)>  
**Sent:** Wednesday, December 10, 2025 2:58 PM  
**To:** Thomas Hickey <[thickey@spicerfirm.com](mailto:thickey@spicerfirm.com)>  
**Cc:** Julie Bowers <[juliebowers@robinfloreslaw.com](mailto:juliebowers@robinfloreslaw.com)>  
**Subject:** Demand to settle from Plaintiff

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Plaintiff directs the following offer to settle all claims against all defendants:

Payment of \$150,000.00

Letter of apology.

Admission that the Defendants were wrong.

Robin Ruben Flores

Attorney-at-Law

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Chattanooga, TN 37411

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**Thomas Morgan** <tom@ibuy423.com>

Mon, Dec 22, 2025 at 9:44 AM

To: Robin Flores <robin@robinfloreslaw.com>

Ya, I'll go to trial.

[Quoted text hidden]

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**Robin Flores** <robin@robinfloreslaw.com>

Mon, Dec 22, 2025 at 9:45 AM

To: Thomas Morgan <tom@ibuy423.com>

Ok, thanks for letting me know.

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**From:** Thomas Morgan <tom@ibuy423.com>

**Sent:** Monday, December 22, 2025 10:44:33 AM

**To:** Robin Flores <robin@robinfloreslaw.com>

**Subject:** Re: Fw: Demand to settle from Plaintiff

[Quoted text hidden]