

# 30% MCA JUDGEMENT

Advance # [REDACTED]

## SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made and entered into by and between LG Funding LLC ("LGF"), and [REDACTED] and [REDACTED] (collectively, the "Defendants").

WHEREAS, judgment was entered on November 27, 2017 in an action in the Supreme Court of the State of New York, County of Niagara, Index No. [REDACTED] in favor of plaintiff LG Funding, LLC and against defendants [REDACTED] and [REDACTED] in the amount of \$84,145.61 plus interest (hereinafter the "Judgment" or "Final Judgment").

WHEREAS, Defendants shall pay to LGF the total sum of Twenty-Five Thousand dollars (\$25,000.00) on or before December 15, 2017:

In no event shall LGF be required to return any funds paid by Defendant, unless such payment is in excess of the amount required to be paid following the satisfaction of the terms herein or, in the event of default, the payment is in excess of the outstanding principal balance, together with any interest, late charges and other fees, under the underlying Receivables Purchase Agreement(s), LGF shall apply the settlement payment to the indebtedness at LGF sole and absolute discretion.

LGF agrees to forbear from further collection efforts pursuant to the Final Judgment or instituting new legal proceedings against Defendant in connection with the Receivables Purchase Agreement(s), so long as Defendant strictly and timely complies with each and every term and condition of the Agreement, and are otherwise not in default (as defined below).