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November 6, 2024

**VIA EMAIL**

Paige Crable, Esq.  
Law Office of Paige E. Crable, PLLC  
19 Dove Street, Suite 101  
Albany, New York 12210

Re: ***Xiangxia Chen v. Daniel May***  
Index No.: 901524-24

Dear Paige:

**FOR SETTLEMENT PURPOSES ONLY – NOT TO BE USED IN LITIGATION**

Kindly be advised, Mack & Associates continues to represent Xiangxia Chen in connection with this matter. Ms. Chen has authorized the following proposal:

**Spousal Support:** Judge Platkin set income within his Decision and Order at \$44,500 for Ms. Chen and \$106,000 for Mr. May. However, although noted that Ms. Chen receives monthly support from her family, that is not a source of income long term, and was only to help Ms. Chen during the final months of the marriage and through this divorce. It will inevitably end, and as a result, should not be considered income.

Therefore, using income of \$106,000 for Mr. May and income of \$34,500.00 for Ms. Chen, the presumptive spousal maintenance obligation is therefore \$1,670 monthly for nine (9) years.

Ms. Chen proposes that the difference be split between the aforementioned \$1,670.00 monthly and the Court Ordered temporary \$1,170 monthly, resulting in a final spousal maintenance award of \$ 1,420 monthly for nine (9) years.

**Real Property:** The marital residence to be sold, with all credit card and marital debt paid off with the proceeds, and any remaining proceeds thereafter to be equally divided, with the Wife to receive an additional \$10,000 for her interest in the Husband's vehicle and counsel fees, as set forth below.

**Bank/Financial Accounts:** Each to keep their own.

**Retirement:** The Wife to receive her one-half (1/2) marital share of the Husband's New York State Pension.

**Automobiles:** The Wife shall waive her interest in the Husband's vehicle for the sum of \$5,000, to be received from the Husband's portion of the sale proceeds from the house. Thereafter, each to keep their own automobiles.

**Personal Property:** Each to keep their own personal belongings and effects. All other personal property to be divided as the parties mutually agree.

**Business:** The Wife shall waive her right to the Husband's business.

**Debts:** Same to be paid off with the sale proceeds from the marital residence.

**Counsel Fees:** The Husband to pay \$5,000.00 toward the Wife's counsel, to be received from the Husband's portion of the sale proceeds from the house.

Please review this proposal and call me at your earliest convenience. Thank you.

Sincerely,

**MACK & ASSOCIATES, PLLC**

*Joseph P. Drescher /s/*

Joseph P. Drescher, Esq.

JPD/

cc: Xiangxia Chen (*via email*)