

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

CHARLES A. HOLT)	
)	
PLAINTIFF,)	CASE NO. 18-CV-02169
)	
V.)	HON. COLIN S. BRUCE
)	
JESSE LEWSADER, RICHARD WILSON,)	MAG. JOHNATHAN HAWLEY
RYAN WASHBURN, and CITY OF PARIS,)	
ILLINOIS, a municipal corporation,)	
)	
DEFENDANTS.)	

**NOTICE OF PLAINTIFF'S ACCEPTANCE OF DEFENDANTS'
SIXTH RULE 68 OFFER OF JUDGMENT**

NOW COMES the Plaintiff, by and through his attorney, Jude M. Redwood, and gives Notice to the Court and Counsel that he accepts the Defendants' Sixth Rule 68 Offer of Judgment in its entirety. Defendants served their Sixth Offer of Judgment on Plaintiff, through email to his counsel on April 25, 2022, a copy of which is attached hereto and incorporated herein as Exhibit A.

Plaintiff respectfully requests the Clerk of the Court to enter judgment against all Defendants, pursuant to Fed.R.Civ.P. 68(a).

Respectfully Submitted,
CHARLES A. HOLT
/s/ Jude M. Redwood ARDC# 6257623

Redwood Law Office
P.O Box 864
St. Joseph, IL 61873
Tel: 217-469-9194
Fax: 217-469-8094
redwoodlaw42@hotmail.com

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2022, I electronically filed the foregoing *NOTICE OF PLAINTIFF'S ACCEPTANCE OF DEFENDANTS' SIXTH RULE 68 OFFER OF JUDGMENT* with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to the following: Jude Redwood, Gail Reich, Joseph Bracey, Julie Koerner, Daniel Corbett, K. Austin Zimmer, Cynthia Grandfield.

/s/Jude Marie Redwood
Ardc # 6257623
Redwood Law Office
P.O.Box 864
St. Joseph, IL 61873
Phone: 217-469-9194
Fax: 217-469-8094
redwoodlaw42@hotmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

CHARLES HOLT,)
vs.)
Plaintiff,) Case No.: 18-CV-2169-CSB-EIL
)
vs.) Judge Colin S. Bruce
JESSE LEWSADER, **RICHARD WILSON**,)
RYAN WASHBURN and CITY OF PARIS,) Magistrate Jonathan E. Hawley
ILLINOIS, a municipal corporation,)
)
Defendants.)

DEFENDANTS' AMENDED SIXTH RULE 68 OFFER OF JUDGMENT TO PLAINTIFF

Defendants, Jesse Lewsader, **Richard Wilson** and the City of Paris, by one of their attorneys, Gail L. Reich, and Ryan Washburn, by his attorney, K. Austin Zimmer, for their Sixth Offer of Judgment to Plaintiff, Charles Holt, pursuant to Fed.R.Civ.P. 68, state as follows:

1. Defendants Fifth Rule 68 Offer of Judgment is withdrawn effective immediately and replaced by Defendants Sixth Rule 68 Offer of Judgment.
2. Defendants hereby now offer to allow judgment to be taken against them by the Plaintiff in the following amounts:
 - a. \$325,001.00 (Three Hundred Twenty-Five Thousand and One Dollars and No/100) against Defendant Ryan Washburn and the City of Paris, plus reasonable attorneys' fees and costs accrued as of the date of acceptance of this offer;
 - b. \$105,001.00 (One Hundred Five Thousand and One Dollars and No/100) against Defendant Jesse Lewsader and the City of Paris, plus reasonable attorneys' fees and costs accrued as of the date of acceptance of this offer;

EXHIBIT A

- c. **\$70,001.00** (Seventy Thousand and One Dollars and No/100) against Defendant **Richard Wilson** and the City of Paris, plus reasonable attorneys' fees and costs accrued as of the date of acceptance of this offer;

3. If the parties cannot reach an agreement on the amount of reasonable attorneys' fees and costs, then reasonable attorneys' fees and costs shall be determined by the Court.
4. This offer of judgment is inclusive of all claims Plaintiff has or may have against Defendants Jesse Lewsader, **Richard Wilson**, Ryan Washburn, the City of Paris, and any other current or former employee or agent of the City of Paris arising from the incident or injuries alleged in Plaintiff's Amended Complaint (Docket No. 53, filed on 3/19/20).
5. This offer of judgment is conditioned upon Plaintiff, Charles Holt's, acceptance of the offer as to each and every Defendant. Acceptance of this offer of judgment against fewer than all Defendants shall be deemed a rejection of this offer.
6. Pursuant to Fed.R.Civ.P. 68, an offer not accepted within fourteen (14) days after service of the offer shall be deemed withdrawn and evidence thereof is not admissible except in a proceeding to determine costs.

Dated this 25th day of April, 2022.

RYAN WASHBURN

By: s/ K. Austin Zimmer
 K. Austin Zimmer #6277559
 Del Galdo Law Group, LLC
 1441 S. Harlem Ave.
 Berwyn, Illinois 60402
 Phone: 708-222-7000
 Fax: 708-222-7001
 Email: zimmer@dlglawgroup.com

JESSE LEWSADER, **RICHARD
WILSON, and THE CITY OF PARIS**

By: s/Gail L. Reich
 Gail L. Reich, #6279564
 O'Halloran, Kosoff, Geitner & Cook, LLC
 650 Dundee Road, Suite 475
 Northbrook, Illinois 60062
 Phone: 847-291-0200
 Fax: 847-291-9230
 Email: greich@okgc.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

CHARLES HOLT,)
vs.)
Plaintiff,) Case No.: 18-CV-2169-CSB-EIL
)
vs.) Judge Colin S. Bruce
JESSE LEWSADER, RICHARD WILSON,)
RYAN WASHBURN and CITY OF PARIS,) Magistrate Jonathan E. Hawley
ILLINOIS, a municipal corporation,)
)
Defendants.)

CERTIFICATE OF SERVICE

I, the undersigned, state that I served ***Defendants' Amended Sixth Rule 68 Offer of Judgment to Plaintiff*** to the following people:

Jude M. Redwood
Redwood Law Office
P.O. Box 864
St. Joseph, IL 61873
redwoodlaw42@hotmail.com

Gail L. Reich
O'Halloran Kosoff Geitner & Cook, LLC
GReich@okgc.com

via electronic mail and U.S. Mail on April 25, 2022. A true and correct copy thereof in a sealed envelope, proper postage prepaid and affixed thereon shall be placed in the U.S. Mail. on April 25, 2022.

s/K. Austin Zimmer
K. Austin Zimmer
Del Galdo Law Group, LLC.
1441 S. Harlem Ave.,
Berwyn, Illinois 60402
(708) 222.7000 (t) | (708) 222.7001 (f)
zimmer@dlggroup.com