

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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FRANK RICCI, ET AL.	:	NO: 3:04-CV-1109 (JBA)
plaintiffs	:	
	:	
v.	:	
	:	
JOHN DESTEFANO, JR, ET AL.	:	
defendants	:	JULY 20, 2011
-----X		


DEFENDANTS' OFFER OF JUDGMENT

Pursuant to Federal Rule of Civil Procedure 68, the defendants, the City of New Haven, John DeStefano, Jr., Karen DuBois-Walton, Thomas Ude, Jr., Tina Burgett, Boise Kimber, Malcolm Webber and Zelma Tirado, hereby make the following offer of judgment to plaintiff James Kottage in full and final satisfaction of any and all claims brought in this lawsuit, including but not limited to claims brought under Title VII of the Civil Rights Act of 1964, the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1985 and the Connecticut state law claim of intentional infliction of emotional distress: the total sum of \$27,266.85 in cash as full satisfaction of any and all claims brought in this lawsuit, as more fully described below. If accepted, \$10,906.74 will be payable by August 31, 2011 and \$16,360.11 will be payable by August 31, 2012.

As to any claims for monetary damages and/or any other form of relief, except for attorney fees and costs¹, the defendants offer \$27,266.85.

In sum, if accepted, judgment will enter against all defendants and in favor of James Kottage, as set forth above.

THE DEFENDANTS
CITY OF NEW HAVEN
JOHN DESTEFANO, JR.
KAREN DUBOIS-WALTON
THOMAS UDE, JR.
TINA BURGETT
BOISE KIMBER
MALCOLM WEBBER
ZELMA TIRADO

By 
Richard A. Roberts (ct 07665)
Stacey L. Pitcher (ct27111)
NUZZO & ROBERTS, L.L.C.
One Town Center
P.O. Box 747
Cheshire, Connecticut 06410
Tel: (203) 250-2000
Fax: (203) 250-3131
rroberts@nuzzo-roberts.com
spitcher@nuzzo-roberts.com

¹ The defendants are simultaneously serving a separate Offer of Judgment as to attorney fees and costs.

CERTIFICATION

This is to certify that on July 20, 2011 a copy of the foregoing was served via electronic mail and U.S. Mail to the following counsel:

Karen Lee Torre, Esq.
The Pattis Law Firm
649 Amity Road
Bethany, CT 06524



Richard A. Roberts

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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FRANK RICCI, et al, : NO. 3:04CV01109 (JBA)
Plaintiffs, :
v. :
JOHN DESTEFANO, et al., :
Defendants. : July 27, 2011

PLAINTIFF JAMES KOTTAGE'S NOTICE OF ACCEPTANCE
OF OFFER OF JUDGMENT

Plaintiff James Kottage hereby unconditionally accepts the offer of judgment by the defendants City of New Haven, John DeStefano, Jr., Karen DuBois-Walton, Thomas Ude, Jr., Tina Burgett, Boise Kimber, Malcolm Webber and Zelma Tirado served on July 20, 2011, a copy of which is attached hereto.

THE PLAINTIFF, JAMES KOTTAGE

BY: 

Karen Lee Torre

Fed. Bar No. ct01707

The Pattis Law Firm, LLC

649 Amity Road

Bethany, CT 06524

Tel: (203) 393-3017

Fax: (203) 393-9745

ktorre@pattislaw.com

His Attorney

CERTIFICATION OF SERVICE

I hereby certify that on July 27, 2011 notice of acceptance of the said offer was served on the defendants by hand-delivery of same to their counsel of record as follows:

Richard A. Roberts
Stacey L. Pitcher
Nuzzo & Roberts, L.L.C.
One Town Center
P.O. Box 747
Cheshire, Connecticut 06410

Notice of this electronic filing will be sent by e-mail to all parties by operation of the Court's electronic filing system as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System



Karen Lee Torpe