

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 18-cv-02593-CMA-STV

MICKEY HOWARD,

Plaintiff,

v.

CITY AND COUNTY OF DENVER,

Defendant.

NOTICE OF ACCEPTANCE WITH OFFER OF JUDGMENT

Pursuant to Fed. R. Civ. P. 68(a), Plaintiff Mickey Howard serves written notice that he accepts the City and County of Denver's attached Offer of Judgment.

Respectfully submitted,

/s/ Rebecca Wallace

Rebecca Wallace
Mark Silverstein
ACLU Foundation of Colorado
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Denver, Colorado 80203
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Attorneys for Plaintiff
ACLU Foundation of Colorado

Dated: December 21, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this 21th day of December, 2018, a true and correct copy of **NOTICE OF ACCEPTANCE WITH OFFER OF JUDGMENT** was filed with the Clerk of the Court via the CM/ECF system, which will send notification of such filing to the following:

Lauren Schmidt
lauren.schmidt@denvergov.org
Denver City Attorney's Office

Michele Horn
michele.horn@denvergov.org
Denver City Attorney's Office

David Maxted
dmaxted@hmflaw.com
Haddon, Morgan and Foreman, P.C.

/s/ Jessica Howard

Jessica Howard
Paralegal

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MICKEY HOWARD,

Plaintiff,

v.

CITY AND COUNTY OF DENVER,

Defendant.

CITY AND COUNTY OF DENVER'S OFFER OF JUDGMENT

Defendant, the City and County of Denver ("Denver"), by and through counsel, hereby tenders the following Offer of Judgment to Plaintiff, Mickey Howard, pursuant to Fed. R. Civ. P. 68:

1. Judgment may be entered against Denver in favor of Plaintiff in the total amount of \$30,000, which amount includes all reasonable recoverable costs and reasonable attorneys' fees.
2. If timely accepted, this Offer of Judgment shall operate as a full adjudication and resolution of all claims against Denver, including any claims for attorneys' fees or costs.
3. This Offer of Judgment shall remain open for acceptance for fourteen days in accordance with the provisions of Fed. R. Civ. P. 68.

DATED this 13th day of December, 2018.

Respectfully submitted,

By: s/ Lauren Schmidt

Lauren Schmidt, Esq.

Michele Horn, Esq.

Assistant City Attorneys

Denver City Attorney's Office

Civil Litigation Section

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E-mail: michele.horn@denvergov.org

Attorneys for Defendant City and County of Denver

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of December, 2018, a true and correct copy of **CITY AND COUNTY OF DENVER'S OFFER OF JUDGMENT** was served via electronic mail upon the following:

Rebecca Wallace
rtwallace@aclu-co.org
Mark Silverstein
msilverstein@aclu-co.org
ACLU Foundation of Colorado

David Maxted
Haddon, Morgan and Foreman
dmaxted@hmflaw.com

s/ Lauren Schmidt
Lauren Schmidt
Office of the Denver City Attorney