

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO  
Honorable Marcia S. Krieger

Civil Action No. 12-cv-00053-MSK-BNB

MAJOR JON MICHAEL SCOTT;

Plaintiff,

v.

CITY & COUNTY OF DENVER,

Defendant.

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**ACCEPTANCE OF OFFER OF JUDGMENT**

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Pursuant to Fed. R. Civ. P. 68(a), Plaintiff hereby serves written notice that he accepts the attached Offer of Judgment.

Respectfully submitted,

/s/ Amy F. Robertson  
Amy F. Robertson  
Fox & Robertson, P.C.  
104 Broadway, Suite 400  
Denver, CO 80203  
303.595.9700 (voice)  
303.595.9705 (fax)  
[arob@foxrob.com](mailto:arob@foxrob.com)

Carrie Ann Lucas  
The Center for Rights of Parents with  
Disabilities  
P.O. Box 756  
Windsor, CO 80550  
720.363.1131 (voice)  
970.460.9197 (fax)  
[clucas@disabledparentrights.org](mailto:clucas@disabledparentrights.org)

Attorneys for Plaintiff

Dated: May 9, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2013, I served the foregoing Acceptance of Offer of Judgment via the CM/ECF system and by email on:

Wendy Shea

[Wendy.Shea@denvergov.org](mailto:Wendy.Shea@denvergov.org)

Joseph M. Rivera

[joseph.rivera@denvergov.org](mailto:joseph.rivera@denvergov.org)

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[Carol.Liang@denvergov.org](mailto:Carol.Liang@denvergov.org)

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By: /s/ Amy F. Robertson  
Amy F. Robertson

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MAJOR JON MICHAEL SCOTT,

Plaintiff,

v.

THE CITY AND COUNTY OF DENVER,

Defendant.

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**OFFER OF JUDGMENT**

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Defendant, the City and County of Denver, by its undersigned attorney, and pursuant to Fed. R. Civ. P. 68, hereby offers to allow judgment to be taken by Plaintiff, Major Jon Michael Scott, upon the following specified terms:

1. The amount of the judgment shall be \$15,000;
2. Said amount is exclusive of any accrued reasonable costs and attorney fees, with such reasonable costs and attorney fees to be determined by the court;
3. Said offer includes any and all liability of the City and County of Denver in regards to the transactions or occurrences referenced in Plaintiff's Complaint; and
4. Said offer shall remain open for acceptance for fourteen (14) days and shall thereafter be withdrawn pursuant to the provisions of Fed. R. Civ. P. 68.

Dated this 26th day of April, 2013.

Respectfully submitted,

By: s/ Wendy Shea  
Wendy J. Shea  
Assistant City Attorney  
Office of the Denver City Attorney  
Litigation Section  
201 West Colfax Ave., Dept. 1108  
Denver, Colorado 80202  
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*Attorney for City and County of Denver*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of April, 2013, the foregoing **OFFER OF JUDGMENT** was served electronically and by placing a true and accurate copy of the same into the United States Mail, first-class postage prepaid, to the following:

Amy Farr Robertson, Esq.  
Fox & Robertson, P.C.  
104 Broadway  
Suite 400  
Denver, CO 80203  
arob@foxrob.com

Carrie Ann Lucas, Esq.  
The Center for Rights of Parents with  
Disabilities  
P.O. Box 756  
Windsor, CO 80550  
clucas@disabledparentrights.org

s/ Veronica Blea  
Office of the Denver City Attorney