

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LUSVINA PAZ)	
)	
Plaintiff,)	
)	
-v-)	Civil Action No.15-cv-05073
)	
PORTFOLIO RECOVERY)	Honorable Manish S. Shah
ASSOCIATES, LLC)	
)	
Defendant.)	

**AGREED MOTION FOR ENTRY OF FINAL JUDGMENT PURSUANT
TO PARTIES STIPULATION**

The Parties, by and through their attorneys, respectfully move this Court, pursuant to Rule 16 of the Federal Rules of Civil Procedure, to enter a final judgment pursuant to the Parties' entered Agreed Stipulation [83], and in support of this motion states as follows:

1. On November 21, 2016, Judge James B. Zagel issued a memorandum opinion in this case granting Plaintiff's Motion for Summary Judgment on liability, and Denying Defendant's Motion for Summary Judgment. (Dkt. #78).
2. On December 13, 2016, the Defendant filed a motion to temporarily stay this case pending the parties' settlement conference with Magistrate Judge Young B. Kim. (Dkt. #80). The court granted this motion on December 14, 2016. (Dkt. #82).
3. The settlement conference was intended to attempt to settle 7 cases, including this case, as part of a global settlement agreement between the parties and took place before and on February 28, 2017, with Magistrate Judge Kim. Despite the parties' best efforts, they were unable to resolve the issues of this case on a global basis.

4. In December of 2016, the executive committee transferred this case to Hon. Manish S. Shah.

5. On April 10, 2017, the parties entered an agreed stipulation that Plaintiff is entitled to \$1,000, representing the amount of statutory damages for a violation of the FDCPA; and that Defendant reserves the right to appeal the finding that it violated the FDCPA. (Dkt. #83).

6. With the court having already entered summary judgment in favor of Plaintiff and against Defendant on liability (Dkt. # 78), and the parties having stipulated that Plaintiff is entitled to \$1,000 in statutory damages, pursuant to 15 U.S.C. § 1692k (Dkt. # 83), the parties request that a final judgment be entered pursuant to the parties' stipulation that judgment is entered in favor of plaintiff and against defendant in the amount of \$1,000.00.

WHEREFORE, the Parties, for the reasons explained above, respectfully move this Court to enter a final judgment in this matter, and for such other relief as this Court deems proper.

Respectfully submitted,

Bryan Thompson
The Thompson Law Firm, P.C.
20 N. Clark St., Suite 3100
Chicago, IL 60602
E-mail: bryan@bryanthompsonlaw.com
Phone: 312-300-4167

By: /s/ Bryan Thompson
Bryan Thompson

David M. Schultz
Raven B. Mackey
Hinshaw & Culbertson LLP
222 North LaSalle Street, Suite 300
Chicago, IL 60601-1081
Tel: 312-704-3000

By: /s/ Raven B. Mackey
Raven B. Mackey