

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SYED A. ALI,
PLAINTIFF,
v.
PORTFOLIO RECOVERY ASSOCIATES, LLC
and BLITT & GAINES, P.C.
and FREEDMAN ANSELMO LINDBERG, LLC
n/k/a ANSELMO LINDBERG OLIVER, LLC
DEFENDANTS.
YASMEEN ALI,
as natural parent and best friend of SHA, a minor,
PLAINTIFF,
v.
PORTFOLIO RECOVERY ASSOCIATES, LLC,
and SANJAY S. JUTLA, and KEVIN J. EGAN,
DEFENDANTS.
SYED A. ALI,
PLAINTIFF,
v.
PORTFOLIO RECOVERY ASSOCIATES, LLC,
and KEVIN J. EGAN,
DEFENDANTS.
SYED A. ALI,
PLAINTIFF,
v.
PORTFOLIO RECOVERY ASSOCIATES, LLC,
DEFENDANT.

Case no.: 15-cv-06178

Judge Sharon Johnson Coleman
Magistrate Judge Daniel G. Martin

Case no.: 15-cv-11582

Case no.: 16-cv-01581

Case no.: 16-cv-03872

**PLAINTIFF'S MOTION TO ENTER JUDGMENT PURSUANT TO DEFENDANT
PORTFOLIO RECOVERY ASSOCIATES, LLC'S RULE 68 OFFER OF JUDGMENT**

NOW COMES Plaintiff Syed A. Ali, by his attorneys The Law Office of M. Kris Kasalo, Ltd. and The Law Office of Robert W. Harrer, P.C., and for his Motion to Enter Judgment Pursuant to Defendant PRA's Rule 68 Offer of Judgment states as follows:

1. On November 18, 2016, Plaintiffs filed their first amended consolidated complaint ("operative complaint"). (Dkt. #127).
2. On November 30, 2016, Defendant Portfolio Recovery Associates, LLC ("PRA") served its Rule 68 Offer of Judgment on Plaintiff via USPS regular mail and email. Defendant's Offer of Judgment stated that judgment shall be entered in the amount of \$1500 for Plaintiff's damages as to Count IX of Plaintiff's Complaint. Defendant's Offer of Judgment further stated that judgment shall be entered against Defendant for reasonable fees and costs incurred in prosecuting Count IX of Plaintiff's Complaint. (Exhibit 1, see Exhibit A to Plaintiff's e-filed Acceptance of Defendant's Rule 68 Offer of Judgment).
3. On December 14, 2016, Plaintiff timely accepted Defendant's Rule 68 Offer of Judgment with respect to Count IX of the operative complaint.
4. On December 22, 2016, Plaintiff's counsel served, via e-mail and USPS regular mail, a copy of Plaintiff's e-filed Notice of Acceptance of Defendant's Rule 68 Offer of Judgment and certificate of service.
5. On January 20, 2017, Plaintiff filed his acceptance of Defendant's Offer of Judgment. (Exhibit 1, Plaintiff's e-filed Acceptance of Defendant's Rule 68 Offer of Judgment) (Dkt. #141).
6. Fed. R. Civ. P. Rule 68(a) states:
 - (a) Making an Offer; Judgment on an Accepted Offer.**

At least 14 days before the date set for trial, a party defending against a claim may serve on an opposing party an offer to allow judgment on specified terms, with the costs then accrued. If, within 14 days after being served, the opposing party serves written notice accepting the offer, either party may then file the offer and notice of acceptance, plus proof of service. The clerk must then enter judgment.

7. Therefore, upon filing the acceptance of the offer and notice of acceptance plus proof of service, judgment is to be entered.

8. Plaintiff has filed his acceptance of the offer, notice of the acceptance and proof of service.

9. Based on the foregoing, pursuant to Defendant's accepted Rule 68 Offer of Judgment, Plaintiff requests that this Honorable Court enter judgment in favor of Plaintiff as to Count IX of the operative complaint, in the amount of \$1500 for Plaintiff's damages plus reasonable attorneys' fees and costs.

WHEREFORE, based on the foregoing, Plaintiff, Syed A. Ali, through his counsel, The Law Office of M. Kris Kasalo, Ltd. and The Law Office of Robert W. Harrer, Ltd. respectfully requests that this court enter judgment in favor of Plaintiff in the amount of \$1500 for Plaintiff's damages plus reasonable attorney's fees and costs pursuant to Defendant's accepted Rule 68 Offer of Judgment as to Count IX of the operative complaint.

By: s/ Robert W. Harrer
Robert W. Harrer

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CERTIFICATE OF SERVICE

I, Robert W. Harrer, an attorney, certify that I shall cause to be served a copy of **PLAINTIFF'S MOTION TO ENTER JUDGMENT PURSUANT TO DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S RULE 68 OFFER OF JUDGMENT** in this case that will be served via ECF on February 14, 2017, on each party that has entered an Appearance herein.

By: s/ Robert W. Harrer
Robert W. Harrer