

**EXHIBIT 1**

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**NOTICE OF ACCEPTANCE OF DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S RULE 68 OFFER OF JUDGMENT AS TO COUNT IX OF PLAINTIFF'S FIRST AMENDED CONSOLIDATED COMPLAINT UNDER CASE #15-cv-6178**

Plaintiff Syed A. Ali hereby accepts Defendant Portfolio Recovery Associates, LLC's Rule 68 Offer of Judgment served on Plaintiff on November 30, 2016 via USPS regular mail and email in the amount of \$1,500.00 for Plaintiff's damages, plus reasonable attorneys' fees and costs arising from Plaintiff's claims against Defendant Portfolio Recovery Associates, LLC in, and only in, Count IX of Plaintiff's First Amended Consolidated Complaint filed on November 18, 2016, the operative complaint at the time Defendant's Rule 68 Offer of Judgment was served. Said Offer of Judgment is attached hereto as Exhibit A.

Plaintiff had timely accepted Defendant's R. 68 Offer of Judgment on December 14, 2016, under case #16-cv-3872, the case associated with Count IX of the operative complaint, and served notice to Defendant on December 22, 2016. On January 6, 2017, this Court struck Plaintiff's Motion for Entry of Judgment in case #16-cv-3872 (Case 16-cv-3872, Dkt. #29). On January 6, 2017, this court also consolidated all related case numbers under 15-cv-6178 and stated "All matters related to this case are to be brought before the Court under case number 15-cv-06178". (Dkt. #139).

Plaintiff hereby requests the Court to enter an Order of Judgment as to Count IX of Plaintiff's First Amended Consolidated Complaint for said amount in accordance with the provisions of Federal Rule of Civil Procedure 68.

Respectfully submitted,  
By /s/ Robert W. Harrer

**Dated: January 19, 2017**

The Law Office of Robert W. Harrer, P.C.  
111 West Washington Street, Suite 1360  
Chicago, IL 60602  
Tel. 312-600-8466 | Fax 312-610-5646  
rob.harrer@harrerlaw.com  
**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2017, I served the foregoing **NOTICE OF ACCEPTANCE OF DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S RULE 68 OFFER OF JUDGMENT AS TO COUNT IX OF PLAINTIFF'S FIRST AMENDED CONSOLIDATED COMPLAINT UNDER CASE #15-cv-6178** and the instant Certificate of Service via electronic filing/ECF on each counsel of record for Defendant who has appeared.

By /s/ Robert W. Harrer

**EXHIBIT A**



**DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S**  
**RULE 68 OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant, PORTFOLIO RECOVERY ASSOCIATES, LLC (“Defendant”), by and through their attorneys, Avanti D. Bakane and Philip T. Barrett of Gordon Rees Scully Mansukhani, LLP, hereby offers to allow judgment to be entered against it in this action, and state as follows:

1. Judgment shall be entered against Defendant in the amount of \$1,500.00 as to Plaintiff arising from Plaintiffs’ claims against Defendant as alleged in Count IX of Plaintiffs’ Complaint.

2. Judgment shall also be entered against Defendant for reasonable fees and costs incurred by Plaintiffs in prosecuting in Count IX of Plaintiffs’ Complaint only in the above-captioned matter, pursuant to 15 U.S.C. 1692k(a)(3), as agreed to by the parties, and, in the event no agreement can be reached, to be determined by the Court.

3. This offer of judgment is inclusive of all damages, fees, and costs as to Plaintiffs’ claims alleged in Count IX of Plaintiffs’ Complaint only.

Dated: November 30, 2016

Respectfully submitted,

**PORTFOLIO RECOVERY ASSOCIATES,  
LLC, Defendant**

Avanti D. Bakane, 6299022  
Philip T. Barrett, 6317319  
Gordon Rees Scully Mansukhani, LLP  
One North Franklin, Suite 800  
Chicago, IL 60606  
Ph: 312-619-4922  
Fax: 312-565-6511  
[abakane@gordonrees.com](mailto:abakane@gordonrees.com)  
[pbarrett@gordonrees.com](mailto:pbarrett@gordonrees.com)

By:           /s/ Avanti D. Bakane            
Avanti D. Bakane

**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2016, I served, the foregoing Defendants **Defendant Portfolio Recovery Associates, LLC's Rule 68 Offer of Judgment** by via electronic and U.S. Mail, proper postage pre-paid, to all parties of record, from One North Franklin, Suite 800, Chicago, IL 60606.

Robert W. Harrer  
[rob.harrer@harrerlaw.com](mailto:rob.harrer@harrerlaw.com)  
The Law Office of Robert W. Harrer, P.C.  
111 W. Washington St.,  
Suite 1360  
Chicago, IL 60602

Mario Kris Kasalo  
[mario.kasalo@kasalolaw.com](mailto:mario.kasalo@kasalolaw.com)  
The Law Office of M. Kris Kasalo, Ltd.  
20 North Clark Street  
Suite 3100  
Chicago, IL 60602

Thomas John Nitschke  
[tjohnnitschke@gmail.com](mailto:tjohnnitschke@gmail.com)  
Blaise & Nitschke, P.C.  
20 N. Clark St.  
Suite 3100  
Chicago, IL 60602

Michael L. Starzec  
[mike@blittandgaines.com](mailto:mike@blittandgaines.com)  
Blitt and Gaines, P.C.  
661 Glenn Avenue  
Wheeling, IL 60090

David M. Schultz  
[dschultz@hinshawlaw.com](mailto:dschultz@hinshawlaw.com)  
Jonathon D. Drews  
[jdrews@hinshawlaw.com](mailto:jdrews@hinshawlaw.com)  
Justin M Penn  
[jpenn@hinshawlaw.com](mailto:jpenn@hinshawlaw.com)  
Hinshaw & Culbertson LLP  
222 N. LaSalle St.  
Ste. 300  
Chicago, IL 60602

By:           /s/ Avanti Bakane            
Avanti Bakane