

3. Pursuant to the Third Amended Complaint, Plaintiff pleaded six causes of action against Defendants as follows:

- a. Count I: Eavesdropping in violation of 720 ILCS 5/14-2 against Defendants Bucon, Adams and Xtreme;
- b. Count II: Intentional Infliction of Emotional Distress against Defendants Bucon, Adams and Xtreme;
- c. Count III: Outrage against Defendants Bucon, Adams and Xtreme;
- d. Count IV: Recovery of Civil Damages Pursuant to 18 U.S.C. §2520 (Federal Wiretapping Act) against Defendants Bucon, Adams and Xtreme;
- e. Count V: Intrusion Upon Seclusion against Defendants Bucon, Adams and Xtreme; and
- f. Count VI: Trespass against Defendants Bucon, Adams and Xtreme.

These claims emanate from actions taken against David in the summer of 2015, when Bucon, at the direction of Adams and Xtreme, texted David threatening messages indicating he was following him, placed GPS tracking devices on David's BMW M6 and Jeep Grand Cherokee, and placed two different eavesdropping devices at David's Learsi Office, located at 3100 Dundee Road, Suite Number 308, in Northbrook, Illinois. All of these actions were taken to intimidate David and to cause intentional emotional and potentially physical harm to David.

4. Plaintiff and Defendant, Michael Bucon have engaged in substantive settlement discussions and are in agreement that this Court should enter a Judgment in favor of Plaintiff and against Defendant, Michael Bucon in the amount of \$50,000.00.

5. In light of the foregoing, this Court should enter a Judgment in favor of Plaintiff and against Defendant, Michael Bucon in the amount of \$50,000.00.

WHEREFORE, Plaintiff, David Israel, prays that this Court enter an Order:

(a) enter a Judgment in favor of Plaintiff and against Defendant, Michael Bucon in the amount of \$50,000.00;

(b) withdraw the pending Plaintiff's Motion for Default Judgment Against Michael Bucon (DE 41); and,

(c) for such other and further relief as this Court deems just and proper.

DAVID ISRAEL, Plaintiff

By: /s/ Ariel Weissberg
One of his attorneys

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