

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

GONZALO MORALES,)	
)	
Plaintiff,)	Case No. 1:18-cv-003210
)	
vs.)	Honorable Judge
)	John J. Tharp, Jr.
EXTRA MILE PAINTING COMPANY,)	
and JAMES FAIRBANKS,)	
)	
Defendants.)	

DEFENDANTS’ MOTION FOR ENTRY OF JUDGMENT PURSUANT TO FED. R. CIV. PRO. 68

Defendants, Extra Mile Painting Company (“EMPC”) and James Fairbanks (“Fairbanks”), by their attorneys, Gaffney and Gaffney, P.C., for their Motion for Entry of Judgment pursuant to Fed. R. Civ. Pro. 68, state:

1. On September 13, 2018, Defendants served Plaintiff with a Fed. R. Civ. Pro. 68 Offer of Judgment. A copy of Defendants’ Offer of Judgment is attached as Exhibit A.
2. On September 27, 2018, Plaintiff accepted Defendants’ Fed. R. Civ. Pro. 68 Offer of Judgment. A copy of Plaintiff’s acceptance is attached as Exhibit B.
3. Upon entry of Judgment, Defendants will tender a cashier’s check to Plaintiff in the amount of \$3,000.00 satisfying the Judgment in open Court or otherwise as the Court directs.
4. Upon entry of Judgment, Plaintiff’s claim for fees and costs can be adjudicated by this Court pursuant to NDIL LR 54.3 or otherwise as the Court deems just.

WHEREFORE, Defendants request that this Court enforce Plaintiff’s acceptance of Defendants’ Fed. R. Civ. Pro. 68 Offer of Judgment attached as Exhibit A., enter Judgment in favor of Plaintiff and against Defendants’ in the amount of \$3,000 plus costs, Enter an Order in

satisfaction of said judgment, and enter an Order pursuant to NDIL LR 54.3 for this Court's adjudication of Plaintiff's claim for attorney's fees and costs.

/s/ Glenn R. Gaffney
Glenn R. Gaffney
Attorney for Defendants

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NOTICE OF FILING / CERTIFICATE OF SERVICE

Glenn R. Gaffney certifies that on October 4, 2018 he efiled the above and foregoing **Motion for Entry of Judgment pursuant to Fed. R. Civ. Pro. 68** via the case management/electronic case filing system with the Clerk of the U.S. District Court, Northern District of Illinois. The parties may access this filing through the Court's electronic filing system and notice of this filing will be sent to the following parties by operation of the Court's electronic filing system.

/s/ Glenn R. Gaffney
Glenn R. Gaffney
Attorney for Defendants

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