THE HONORABLE RONALD B. LEIGHTON 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 FOR THE WESTRN DISTRICT OF WASHINGTON 8 AT TACOMA 9 CAROLYN ANDERSON, NO. C11-902RBL 10 Plaintiff. OFFER OF JUDGMENT 11 ٧. 12 DOMINO'S PIZZA, INC., DOMINO'S PIZZA, LLC, 13 FOUR OUR FAMILIES, INC., and CALL-EM-ALL, LLC, 14 Defendants. 15 16 TO: **CAROLYN ANDERSON** 17 Her attorneys of record, Rob Williamson and Kim Williams of the Law AND TO: Offices of Williamson and Williams 18 PLEASE BE ADVISED that pursuant to Federal Civil Rule 68, the following Offer of 19 20 Judgment is being served upon you, at least ten (10) days prior to trial and thirty (30) 21 days after the completion of the service and filing of the summons and complaint. 22 Defendant, Four Our Families, Inc., wish to bring this matter to a quick and 23 amicable disposition. Therefore, Defendant will offer to settle this case at the present 24 time in the amount of Three Thousand Dollars (\$3,000.00) representing Plaintiff's 25 maximum amount of damages. 26 FAUBION, REEDER, FRALEY & COOK, P.S. Offer of Judgment- 1 of 3 RCW 4.84.280, Rev 4/01 5920 100th St. SW #25 Lakewood, WA 98499 (253) 581-0660

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Pursuant to FRCP 68, this offer will not be filed nor communicated to the Court until after judgment is rendered.

In the event you fail to accept this offer within fourteen (14) days of receipt, YOU ARE FURTHER ADVISED that pursuant to FRCP 68, this offer shall be deemed withdrawn. There shall be taxed and allowed to the Defendant, Four Our Families Inc., if judgment is rendered for you, not exceeding the offer contained herein, Defendant's costs and reasonable attorney's fees, as a part of the costs of this action. Reasonable attorney fees are considered costs under the Washington Consumer Protection Act, RCW 19.86 et. seq.

Dated this 5th day of July, 2012.

s/Nelson C. Fraley II

Nelson C. Fraley, II, WSBA No. 26742 Nicole C. Brown, WSBA No. 40704 Attorneys for Plaintiff FAUBION REEDER FRALEY & COOK, PS 5920 100th Street SW, Suite 25 Lakewood, WA 98499 Telephone: (253) 581-0660

Fax: (253) 581-0894 Email: nfraley@fjr-law.com

<u>'</u>	CERTIFICATE OF SERVICE
2	I hereby cortify that an August 27, 2010, I also the size II. (II. I.
3	I hereby certify that on August 27, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing
4	to the following:
5	Kim Williams
6	Rob Williamson Williamson & Williams
7	187 Parfitt Way SW, Suite 250 Bainbridge Island, WA 98110
8	Attorneys for Plaintiff
9	David M. Soderland
10	Dunlap & Soderland, P.S. 901 Fifth Avenue, Suite 3003
	Seattle, WA 98164
11	Attorneys for Domino's Pizza
12	Kelly P. Corr
13	Corr Cronin Michelson, et al. 1001 Fourth Avenue, Suite 3900
14	Seattle, WA 98154 Attorneys for Call-Em-All, LLC
15	
16	Andrew B. Lustigman Scott Shaffer
17	Olshan Grundman Frome
18	Rosenzweig & Wolosky, LLP Park Avenue Tower
19	65 East 55 th Street New York, NY 10022
20	Pro Hac Vice Attorneys for Call-Em-
21	All, LLC
	s/ Lona Hertz
22	Faubion Reeder Fraley & Cook, PS 5920 100 th Street SW, Suite 25
23	Lakewood, WA 98499 Telephone: (253) 581-0660
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Offer of Judgment- 3 of 3 RCW 4.84.280, Rev 4/01

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