

Multiple Documents

Part	Description
<u>1</u>	2 pages
<u>2</u>	Exhibit Defendants Offer of Judgment

UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

PRISON LEGAL NEWS and	*	NUMBER: 11-2277
HUMAN RIGHTS DEFENSE CENTER,	*	
Plaintiffs	*	SECTION: A
VERSUS	*	
	*	JUDGE: Jay C. Zainey
MARLIN GUSMAN, Sheriff, Orleans	*	
Parish, CARLOS LOUQUE, Warden,	*	MAG. SECTION: 1
House of Detention, KEVIN WINFIELD,	*	
Warden, Old Parish Prison, CHARLES	*	MAGISTRATE: Sally Shushan
EZEB, Warden, Temporary Jails, JERROD	*	
SPINNEY, Warden, Conchetta,	*	
JOHN DOE 1, Mailroom Supervisor,	*	
OPP and JOHN DOE 2,	*	
Mailroom Employee, OPP	*	
Defendants	*	

REQUEST FOR ENTRY OF JUDGMENT AGAINST DEFENDANTS

NOW COME PLAINTIFFS, in the above captioned case, through undersigned counsel, who hereby notify the Clerk of Court and all defendants through their counsel, that the plaintiffs ACCEPT the offer of judgment set forth below and attached hereto as Exhibit 1, which was dated July 10, 2012, postmarked July 11, 2012 and was received by plaintiffs' counsel via U.S. mail certified, on July 13, 2012, as follows:

Please be advised that Marlin N. Gusman, the Sheriff of Orleans Parish, Carlos Louque, Kevin Winfield, Charles Ezeb, Jerrod Spinney, Bonita Pittman, defendants in this action, jointly offer to allow judgment to be taken against them by plaintiffs for the total sum of **fifteen thousand dollars (\$15,000)**, exclusive of costs and attorney fees accrued to this date. This offer is made pursuant to Rule 68 of the Federal Rules of Civil Procedure, and evidence of this offer is not admissible except in a proceeding to determine costs. If this offer is not accepted in writing within fourteen (14) days after it is served, it will be deemed withdrawn.

Dated: July 10, 2012.

The Clerk is requested to Enter Judgment against the defendants Marlin N. Gusman, the Sheriff of Orleans Parish, Carlos Louque, Kevin Winfield, Charles Ezeb, Jerrod Spinney, Bonita Pittman as stated.

Respectfully Submitted,



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Lance Webber, Pro Hac Vice
Human Rights Defense Center
P.O. Box 2420
Brattleboro, VT 05303
(802) 579-1309

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2012, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all parties.



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July 10, 2012

To: PRISON LEGAL NEWS and
HUMAN RIGHTS CENTER, Plaintiffs
Through their counsel of record:
Mary E. Howell, Esq.
316 S. Dorgenois St.
New Orleans, LA 70119

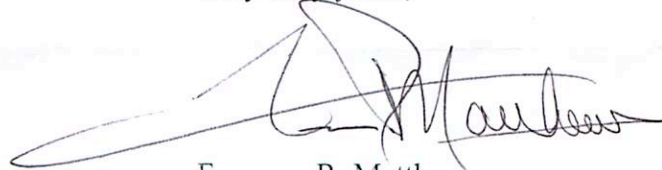
Dear Ms. Howell:

Please be advised that Marlin N. Gusman, the Sheriff of Orleans Parish, Carlos Louque, Kevin Winfield, Charles Ezeb, Jerrod Spinney, and Bonita Pittman, defendants in this action, jointly offer to allow judgment to be taken against them by the plaintiffs for the total sum of **fifteen thousand dollars (\$15,000)**, exclusive of costs and attorney fees accrued to this date. This offer is made pursuant to Rule 68 of the Federal Rules of Civil Procedure, and evidence of this offer is not admissible except in a proceeding to determine costs. If this offer is not accepted in writing within fourteen (14) days after it is served, it will be deemed withdrawn.

Dated: July 10, 2012.

With kind regards, I remain

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Freeman R. Matthews', with a large, sweeping initial 'F'.

Freeman R. Matthews

RECEIVED BY MAIL

7/23/12

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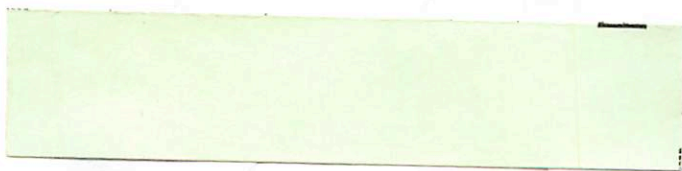
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PRESS, FOLD AT DOTTED LINE
MAIL



General Information

Case Name	Prison Legal News et al v. Gusman et al
Docket Number	2:11-cv-02277
Court	United States District Court for the Eastern District of Louisiana
Nature of Suit	Civil Rights: Other