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13 **UNITED STATES DISTRICT COURT**
14 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

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17 ISAAC NEWMAN,
18 Plaintiff,

19 v.

20 ELK GROVE EDUCATION ASSOCIATION,
21 Defendant.

Case No. 2:24-cv-01487-WBS-SCR

**REQUEST FOR ENTRY OF
JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 68**

Hearing Date: October 15, 2024
Hearing Time: 1:30 PM
Location: Courtroom 5, 14th Floor
Judge: Hon. William Shubb

1 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 WHEREAS, on August 26, 2024, Defendant Elk Grove Education Association made an
4 Offer of Judgment to Plaintiff Isaac Newman pursuant to Federal Rule of Civil Procedure 68 (the
5 “Offer”), a copy of which is attached hereto as “Exhibit A” and incorporated by reference herein;

6 WHEREAS, Plaintiff accepted Defendant’s Offer on September 5, 2024, via letter
7 transmitted by electronic and first-class mail, a copy of which is attached hereto as “Exhibit B”
8 and incorporated by reference herein;

9 PLAINTIFF RESPECTFULLY REQUESTS, that this Court enter judgment in his favor
10 and against Defendant in the amount of \$12,000 (twelve thousand dollars), consistent with the
11 terms and conditions contained in the Offer.

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13 Respectfully submitted,

14 Date: 9/5/2024

By: /s/ Stephen B. Edwards
Stephen B. Edwards

Attorney for Plaintiff Isaac Newman

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