

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT


-----X		
FRANK RICCI, ET AL.	:	NO: 3:04-CV-1109 (JBA)
plaintiffs	:	
	:	
v.	:	
	:	
JOHN DESTEFANO, JR, ET AL.	:	
defendants	:	JULY 20, 2011
-----X		

DEFENDANTS' OFFER OF JUDGMENT

Pursuant to Federal Rule of Civil Procedure 68, the defendants, the City of New Haven, John DeStefano, Jr., Karen DuBois-Walton, Thomas Ude, Jr., Tina Burgett, Boise Kimber, Malcolm Webber and Zelma Tirado, hereby make the following offer of judgment to all twenty plaintiffs, Michael Blatchley, Gregory Boivin, Gary Carbone, Michael Christoforo, Ryan Divito, Steven Durand, William Gambardella, Brian Jooss, James Kottage, Mathew Marcarelli, Thomas Michaels, Christopher Parker, Sean Patton, Frank Ricci, Edward Riordon, Kevin Roxbee, Timothy Scanlon, Benjamin Vargas, John Vendetto and Mark Vendetto, in full and final satisfaction of any and all attorney fees and costs incurred for the prosecution of any and all claims brought in this lawsuit, including but not limited to claims brought under Title VII of the Civil Rights Act of 1964, the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1985 and the Connecticut state law claim of intentional infliction of

emotional distress: \$3,000,000. If accepted, \$1,200,000 will be payable by August 31, 2011 and \$1,800,000 will be payable by August 31, 2012.

THE DEFENDANTS
CITY OF NEW HAVEN
JOHN DESTEFANO, JR.
KAREN DUBOIS-WALTON
THOMAS UDE, JR.
TINA BURGETT
BOISE KIMBER
MALCOLM WEBBER
ZELMA TIRADO

By 
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CERTIFICATION

This is to certify that on July 20, 2011 a copy of the foregoing was served via electronic mail and U.S. Mail to the following counsel:

Karen Lee Torre, Esq.
The Pattis Law Firm
649 Amity Road
Bethany, CT 06524



Richard A. Roberts

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