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12 *Attorneys for Plaintiff Gregory Wilson*

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

GREGORY WILSON, an individual,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

COWBOY JACK, INC., a California
Corporation; ROBERT MATTHEW
KERCHNER, an individual; MICHAEL
ROBERT ELLIOTT, an individual; DOE 1
through and including DOE 10,

Defendants.

Case No: 21STCV30959

*Assigned to Hon. Amy D. Hogue
Dept. 7*

**NOTICE OF ACCEPTANCE OF
DEFENDANTS' OFFER TO
COMPROMISE
[Code of Civil Procedure §998]**

File Date: August 19, 2021

1 TO EACH PARTY AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Plaintiff Gregory Wilson accepts Defendants' Offer to
3 Compromise, a copy of which is attached hereto as Exhibit 1.

4
5 DATED: January 26, 2022

HARRIS & RUBLE

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7 Alan Harris
8 Attorney for Plaintiff
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Exhibit 1

1 MICHAEL R. NEWHOUSE (SBN 211204)
2 SUZANNE M. HENRY (SBN 204772)
3 mnewhouse@newhouselawgroup.com
4 mmoore@newhouselawgroup.com
5 shenry@newhouselawgroup.com
6 NEWHOUSE LAW GROUP, PC
7 1800 Century Park East, 6th Floor
8 Los Angeles, California 90067
9 Telephone: (310) 684-3162
10 Facsimile: (310) 694-0736

11 Attorneys for Defendants
12 Cowboy Jack, Inc., Robert Matthew
13 Kerchner, and Michael Robert Elliott

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT - SPRING STREET COURTHOUSE

GREGORY WILSON, an individual,
individually and on behalf of all other similarly
situated

Plaintiffs,

vs.

COWBOY JACK, INC., a California
Corporation; ROBERT MATTHEW
KERCHNER, an individual; MICHAEL
ROBERT ELLIOTT, an individual; and DOE1
through and including DOE 10,

Defendants.

CASE NO: 21STCV30959

Assigned to Hon. Amy D. Hogue, Dept. 7

OFFER TO COMPROMISE
(Code of Civil Procedure §998)

Complaint filed: 8/19/21
Trial Date: NONE

1 **TO PLAINTIFF GREGORY WILSON AND TO HIS ATTORNEYS OF RECORD:**

2 Pursuant to Code of Civil Procedure § 998, Defendants Cowboy Jack, Inc., Robert
3 Matthew Kerchner and Michael Robert Elliot collectively offer to pay to Plaintiff, in exchange for
4 dismissal of this action with prejudice, the sum of sixteen thousand and one dollars (\$16,001.00)
5 plus costs pursuant to Code of Civil Procedure §1032 and reasonable attorneys' fees allowed by
6 law as determined by the court, in satisfaction of all claims alleged by Plaintiff in this action.
7

8 You may indicate your acceptance of this offer by signing the statement to that effect set
9 forth below.

10 NEWHOUSE LAW GROUP, PC

11 

12 DATED: January 25, 2022

13 By: _____

14 MICHAEL R. NEWHOUSE
15 SUZANNE M. HENRY
16 Attorneys for Defendants
Cowboy Jack, Inc, Robert Matthew
Kerchner, and Michael Robert Elliott

17 **Plaintiff accepts the above offer on the terms stated.**

18
19 DATED: January 26, 2021

HARRIS & RUBLE

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22 _____
23 Alan Harris
24 Attorneys for Plaintiff Gregory Wilson
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On January 25, 2022, I served the foregoing document described as **OFFER TO COMPROMISE (CODE OF CIVIL PROCEDURE §998)** on the parties by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

☒ **BY ELECTRONIC SERVICE via CaseAnywhere:** I caused the above-referenced document(s) to be served through CaseAnywhere, for the above-entitled case, to the parties as indicated in the attached Service List. Upon completion of transmission of said document(s), a receipt is issued acknowledging receipt and service by CaseAnywhere. A copy of CaseAnywhere 's receipt will be maintained with the original document(s) in our office.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 25, 2022 at Los Angeles, California.

PROOF OF SERVICE

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SERVICE LIST

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Attorneys for Plaintiffs GREGORY WILSON, an
individual, individually and on behalf of all other
similarly situated

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NOTICE OF ACCEPTANCE OF DEFENDANTS' OFFER TO COMPROMISE

Michael Newhouse
Suzanne M. Henry
NEWHOUSE LAW GROUP, P.C.
1800 Century Park East, 6th Floor
Los Angeles CA 90067


Tom Brennan