

Received

DEC 03 2012

Sheridan Law Firm P.S.

- 1 EXPEDITE
- 2 No Hearing Set
- 3 Hearing is Set

Date:

Time:

The Honorable Carol Murphy

7
8 **STATE OF WASHINGTON**
THURSTON COUNTY SUPERIOR COURT

9 STEPHEN CHAUSSEE, an individual,

NO. 11-2-01884-6

10 Plaintiff,

OFFER OF JUDGMENT

11 v.

12 STATE OF WASHINGTON,

13 Defendant.

14 TO: STEPHEN CHAUSSEE, Plaintiff

15 AND TO: JOHN P. SHERIDAN, Plaintiff's Attorney

16 Under CR 68, Defendant State of Washington, hereby offers to allow Plaintiff,
17 Stephen Chaussee, to take judgment against the State of Washington in this matter pursuant
18 to RCW Ch. 4.92, which judgment shall be Ten Thousand and One dollars (\$10,001).
19 Additionally, Defendant State of Washington hereby offers to pay Stephen Chaussee's
20 awardable costs and reasonable attorney's fees accrued in this lawsuit up to the date/time of
21 this Offer, which sum shall be determined by the Thurston County Superior Court in the
22 event that counsel for the parties cannot agree within 10 days of Plaintiff's timely
23 acceptance. Plaintiff's claimed costs and fees shall be substantiated by billing records
24 attached to Plaintiff's acceptance of this Offer detailing the nature and date of the work
25 performed and hours accrued.
26

OFFER OF JUDGMENT

1
COPY

ATTORNEY GENERAL OF WASHINGTON
Torts Division
7141 Cleanwater Drive SW
PO Box 40126
Olympia, WA 98504-0126
(360) 586-6300

1 Pursuant to the provisions of RCW 4.92 et seq., judgment may only be entered against
2 and payment made by the State of Washington. This Offer is extended to settle and finally
3 resolve all legal and equitable relief sought by Stephen Chaussee in this case against the
4 Defendant State of Washington, as well as any other current or former employees or agents
5 of the state.

6 This Offer is made for the purposes of CR 68, and may not be construed as a waiver of
7 any defenses or objections, an admission that Defendant is liable, or that any claimed injuries
8 or damages are the result of any action or inaction on the part of the Defendant.

9 This Offer is made in an attempt to allow Plaintiff and Defendant to compromise their
10 respective litigation positions, to eliminate the added costs of further trial preparation, and to
11 avoid the risks and expenses of trial.

12 DATED this 30th day of November, 2012.

13
14 ROBERT M. McKENNA
Attorney General

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16 MARIE C. CLARKE, WSBA No. 36146
17 Assistant Attorney General

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PROOF OF SERVICE

I certify that I served a copy of this document on all parties or their counsel of record on the date below as follows:

John P. Sheridan
THE SHERIDAN LAW FIRM PS
Hoge Building, Suite 1200
705 Second Avenue
Seattle, WA 98104
(206) 381-5949

US Mail Postage Prepaid via Consolidated Mail Service

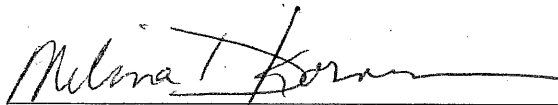
ABC/Legal Messenger

State Campus Delivery

Hand delivered by _____

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 30th day of November, 2012, at Tumwater, WA.



MELISSA D. KORNMANN, L3