

IN THE UNITED STATES DISTRICT COURT IN THE DISTRICT OF KANSAS,
AT KANSAS CITY, KANSAS

KENNETH SNYDER,)	
)	
Plaintiff,)	
vs.)	
)	Case No. 12-CV-2723 JAR/DJW
WILLIAM JOHNSON, individually;)	
ERIC CLARK, individually; and)	
UNITED GOVERNMENT OF WYANDOTTE)	
COUNTY/ KANSAS CITY d/b/a BOARD OF)	
PUBLIC UTILITIES,)	
)	
Defendants.)	
_____)	

**PLAINTIFF’S NOTICE OF ACCEPTANCE OF DEFENDANTS’
OFFER OF JUDGMENT**

Pursuant to Fed. R. Civ. P. 68, Plaintiff, Kenneth Snyder, through his undersigned counsel, hereby accepts and provides notice that he has accepted Defendants’ Offer of Judgment dated August 1, 2013, and served on August 2, 2013, attached hereto as Exhibit A.

DATED: August 15, 2013.

Respectfully submitted,

LEEDS LAW, LLC

By: s/Luanne Leeds
Luanne Leeds, KS#22774
leedslua@gmail.com
515 SW Horne Street, Suite 201
Topeka, Kansas 66606
(785) 354-0727; Fax: (785) 354-0736
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2013, the above and foregoing was served upon the following via electronic mail:

Robert J. Wonnell #20727
Jane Sieve-Wilson #23837
McAnany, Van Cleave & Phillips, P.A.
10 E. Cambridge Circle Drive, Suite 300
Kansas City, Kansas 66103
Attorneys for Defendants

s/Luanne Leeds
LUANNE LEEDS, #22774

2470.24

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

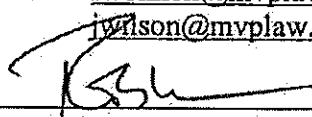
KENNETH SNYDER,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 12-CV-2723 JAR/DJW
)	
WILLIAM JOHNSON, et al)	
)	
Defendants.)	

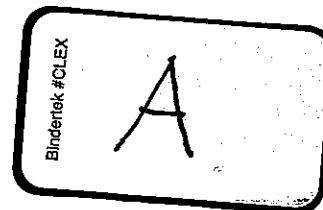
OFFER OF JUDGMENT

COME NOW Defendants Unified Government of Wyandotte County/Kansas City, Kansas/Board of Public Utilities, William Johnson and Eric Clark and pursuant to FED.R.CIV.P. 68, hereby make Plaintiff Kenneth Snyder an offer of judgment in the amount of \$20,000.00 plus reasonable attorneys' fees and costs which have been incurred to date in this cause, as determined by this Court or by agreement of the parties. This Offer of Judgment is made for the purposes specified in FED.R.CIV.P. 68, and is not to be construed as an admission that Defendants are liable in this action, that Plaintiff has suffered any damages, or that Defendants are indebted in any way to Plaintiff.

Respectfully submitted,

McAnany, Van Cleave & Phillips, P.A.
10 E. Cambridge Circle Drive, Suite 300
Kansas City, Kansas 66103
Telephone (913) 371-3838
Fax (913) 371-4722
Email: rwonnell@mvplaw.com
jsiege-wilson@mvplaw.com

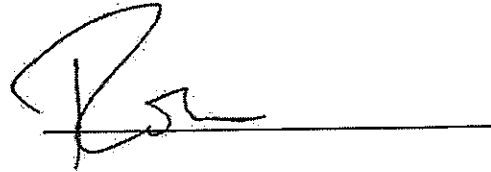
By: 
Robert J. Wonnell #20727
Jane Sieve-Wilson #23837
Attorneys for Defendants



CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a true and correct copy of the above and foregoing was sent electronically pursuant to D.Kan.R. 5.4.2 and 26.3 and via U.S. first-class mail, postage prepaid, to the below listed individuals on this the 1st day of August, 2013.

Luanne Leeds
LEEDS LAW, LLC
515 SW Horne Street, Ste. 201
Topeka, KS 66606
leedslua@gmail.com
Attorney for Plaintiff



Kendra Slater

From: luanne leeds <leedslua@gmail.com>
Sent: Friday, August 02, 2013 1:14 PM
To: Robert J. Wonnell
Cc: Lisa D. Loveless; slater.kendra@gmail.com; Carl Gallagher; Debi Massey; Jane A. Sieve-Wilson
Subject: Re: Snyder, Kenneth v. William Johnson, Eric Clark, and UG d/b/a BPU 2470.24

Rob,
Your email is sufficient. No need to re-issue a certificate of service.
Thanks,
Luanne

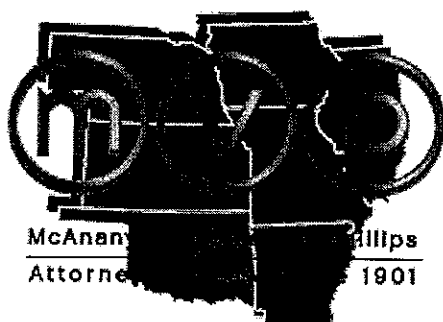
On Fri, Aug 2, 2013 at 10:26 AM, Robert J. Wonnell <rwonnell@mvplaw.com> wrote:

Luanne,

The certificate of service is wrong. It says yesterday, but it is being served today. I apologize for the error. Please confirm this email is sufficient to establish the date for the certificate of service, or if you need me to re-issue the certificate of service. Thanks.

Rob

Robert J. Wonnell
Attorney at Law



McAnany, Van Cleave & Phillips, P.A.
10 E. Cambridge Circle Drive, Suite 300
Kansas City, KS 66103
Direct Line: [913-573-3315](tel:913-573-3315)
Main: [913-371-3838](tel:913-371-3838)
Fax: [913-371-4722](tel:913-371-4722)
rwonnell@mvplaw.com

2013 MVP Law Seminars



[Register Now](#)

CONFIDENTIALITY NOTICE: This message, and any accompanying attachments, are confidential and are only intended for the individual(s) or entity to which this message is addressed and may contain information that is attorney work product, privileged, confidential or protected from disclosure under applicable law. This message is not intended to be relied upon by unintended recipients or by any third party. If you are not a named addressee, you are bound by this confidentiality and you should not disseminate, distribute, or copy this message. If you are not a named addressee, please notify the sender immediately by e-mail and delete this message and any attachments from your system. There is no intent on the part of the sender to waive any privilege, including attorney/client privilege, which may attach to this message or any attachments. E-mail transmission cannot be guaranteed to be secure or error-free, as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. McAnany, Van Cleave & Phillips, P.A. accepts no liability for any damage caused by any error or omission contained within the message or by any virus transmitted by this message. If verification is required, please request a hard-copy version. McAnany, Van Cleave & Phillips, P.A., 10 E. Cambridge Circle Drive, Suite 300, Kansas City, KS 66103 or call (913) 371-3838.

From: Lisa D. Loveless
Sent: Friday, August 02, 2013 10:22 AM
To: 'leedslua@gmail.com'
Cc: 'slater.kendra@gmail.com'; Robert J. Wonnell; Carl Gallagher; Debi Massey; Jane A. Sieve-Wilson
Subject: Snyder, Kenneth v. William Johnson, Eric Clark, and UG d/b/a BPU 2470.24

Ms. Leeds,

Attached please find correspondence from Rob Wonnell.

Thank you,

Lisa D. Loveless

Legal Secretary

McAnany, Van Cleave & Phillips, P.A.

10 E. Cambridge Circle Drive, Suite 300

Kansas City, KS 66103

Direct Line: [913-371-3712](tel:913-371-3712)

Main: [913-371-3838](tel:913-371-3838)

Fax: [913-371-4722](tel:913-371-4722)

lloveless@mvplaw.com

CONFIDENTIALITY NOTICE: This message, and any accompanying attachments, are confidential and are only intended for the individual(s) or entity to which this message is addressed and may contain information that is attorney work product, privileged, confidential or protected from disclosure under applicable law. This message is not intended to be relied upon by unintended recipients or by any third party. If you are not a named addressee, you are bound by this confidentiality and you should not disseminate, distribute, or copy this message. If you are not a named addressee, please notify the sender immediately by e-mail and delete this

message and any attachments from your system. There is no intent on the part of the sender to waive any privilege, including attorney/client privilege, which may attach to this message or any attachments. E-mail transmission cannot be guaranteed to be secure or error-free, as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. McAnany, Van Cleave & Phillips, P.A. accepts no liability for any damage caused by any error or omission contained within the message or by any virus transmitted by this message. If verification is required, please request a hard-copy version. McAnany, Van Cleave & Phillips, P.A., 10 E. Cambridge Circle Drive, Suite 300, Kansas City, KS 66103 or call (913) 371-3838.

--
Luanne Leeds
Leeds Law, LLC
515 SW Home, Ste. 201
Topeka, KS 66606
(785)354-0727
Fax: (785)354-0728