

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Travis Cook, )  
                  )  
                  )  
                  )  
Plaintiff,     )  
                  )  
                  )   No. 24-cv-2401  
-vs-            )  
                  )   (Judge Pacold)  
Sheriff of Cook County and Cook     )  
County, Illinois,     )  
                  )  
                  )  
Defendants.     )

**NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT**

Pursuant to Rule 68(a) of the Federal Rules of Civil Procedure, notice is hereby given that plaintiff hereby accepts the attached offer of judgment served by defendants on September 27, 2024.

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
200 S Michigan Ave, Ste 201  
Chicago, IL 60604  
(312) 427-3200  
*an attorney for plaintiff*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Travis Cook, )  
                  )  
                  )  
                  )  
*Plaintiff*, )  
                  )  
                  ) No. 24-cv-2401  
-vs-            )  
                  )  
                  )  
Sheriff of Cook County and Cook County, )  
Illinois,          )  
                  )  
                  )  
*Defendants*. )

**OFFER OF JUDGMENT PURSUANT TO RULE 68 OF THE  
FEDERAL RULES OF CIVIL PROCEDURE**

NOW COMES the COUNTY OF COOK, as indemnitor, and/or potential indemnitor, of COOK COUNTY SHERIFF'S OFFICE (the "County Defendants"), by their attorney, KIMBERLY M. FOXX, State's Attorney of Cook County, and through her assistant state's attorney, Robin Clayton, and pursuant to Rule 68 of the Federal Rules of Civil Procedure hereby offers to allow judgment to be taken by Travis Cook against COOK COUNTY in this cause of action, in return for termination of this litigation against all named and unnamed County Defendants, for:

1. Compensatory and statutory damages in the amount of TWO THOUSAND AND ONE DOLLARS (\$2,001.00);
2. Reasonable attorneys' fees, litigation expenses, and costs in the amount of EIGHT THOUSAND DOLLARS (\$8,000.00), pursuant to 42 U.S.C. §1988; and
3. TRAVIS COOK further waives the right to appeal any and all judgments associated with this litigation.

This offer of judgment is made for the purposes specified in Rule 68 and is not to be construed either as an admission that the County Defendants are liable in this action or that the Plaintiff has suffered any damage as a result of any action, unlawful custom, policy or practice. To accept this offer, Plaintiff must serve written notice of acceptance within fourteen (14) days of the date that this offer is made. This offer of judgment is intended to resolve all of Plaintiff's claims in this action, including without limitation any and all claims for compensatory damages, statutory damages, attorneys' fees, litigation expenses, and costs of suit. This offer of judgment shall not be filed with the Court unless (a) accepted or (b) in a proceeding to determine the reasonableness hereof.

Respectfully Submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

By: /s/ Robin Clayton  
Robin Clayton  
Assistant State's Attorney  
500 Richard J. Daley Center  
Chicago, IL 60602  
(312) 603-3401

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Travis Cook, )  
 )  
 Plaintiff, )  
 ) No. 24-cv-2401  
 -vs- )  
 ) Judge Pacold  
 Sheriff of Cook County and Cook County, )  
 Illinois, )  
 )  
 Defendants. )

## **CERTIFICATE OF SERVICE**

**TO:** Kenneth Flaxman  
Kenneth N. Flaxman, P.C.  
200 S Michigan Ave, Ste 201  
Chicago, IL 60604  
Email: kenlaw.com

I Robin Clayton, Assistant State's Attorney, certify that I served the aforementioned *Offer of Judgment Pursuant to Rule 68 of the Federal Rules of Civil Procedure*, by mailing a copy to the above named persons at the above address, via electronic mail, and by depositing a copy of the same in the United States Mail at 500 Richard J. Daley Center, Chicago, Illinois 60602, postage prepaid, before 5:00 p.m., on September 27, 2024.

/s/ Robin Clayton  
Robin Clayton