

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHERIE SANTAI

vs.

FRED BEANS FORD, INC., FRED  
BEANS HYUNDAI, FRED BEANS,  
Individually and on behalf of Fred Beans  
Ford, Inc., and ELIZABETH BEANS  
GILBERT, Individually and on behalf of  
Fred Beans Ford, Inc.

Civil Action No. 10-2367

**OFFER OF JUDGMENT PURSUANT TO RULE 68**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants, Fred Beans Ford, Inc. d/b/a Fred Beans Hyundai, Fred Beans and Elizabeth Beans Gilbert, by their attorney, Elizabeth F. Walker, Esquire of Kennedy, Campbell, Lipski & Dochney hereby offer to allow judgment to be entered against Defendant, Fred Beans Ford, Inc. and in favor of Plaintiff, Cherie Santai, in the amount of One Hundred Fifty Thousand (\$150,000.00) Dollars, together with reasonable attorneys fees and costs incurred to date subject to Plaintiff agreeing to dismiss her Complaint in the above matter as to all Defendants, with prejudice. This offer of judgment is not to be construed either as an admission of liability by any of the Defendants or an admission that Plaintiff has suffered any damage. By making this offer, Defendants simply agrees to permit judgment to be entered against Fred Beans Ford, Inc. in accordance with Rule 68 of the Federal Rules of Civil Procedure. This offer applies to all pending claims between the Plaintiff and Defendants, and if accepted, acts as a complete bar to any further claims arising from the facts that form the subject matter of this action.





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Elizabeth F. Walker, Esquire  
Attorney for Defendants,  
Fred Beans Ford, Inc, d/b/a Fred Beans  
Hyundai, Fred Beans and Elizabeth Beans Gilbert  
**KENNEDY, CAMPBELL, LIPSKI  
& DOCHNEY**  
1818 Market Street, Suite 2510  
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[Beth.Walker@Zurichna.com](mailto:Beth.Walker@Zurichna.com)

Date: August 23, 2011

#### CERTIFICATION OF SERVICE

I, Elizabeth F. Walker, Esquire, hereby certify that a true and correct copy of the foregoing Offer of Judgment was served by email and First Class mail upon the following counsel of record on the date set forth below:

Craig Thor Kimmel, Esquire  
Tara Leigh Patterson, Esquire  
Kimmel & Silverman, P.C.  
30 E. Butler Pike  
Ambler, PA 19002

[kimmel@creditlaw.com](mailto:kimmel@creditlaw.com)

[tpatterson@creditlaw.com](mailto:tpatterson@creditlaw.com)



Date: August 23, 2011

By:

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Elizabeth F. Walker, Esquire  
Attorney for Defendants,  
Fred Beans Ford, Inc, d/b/a Fred Beans  
Hyundai, Fred Beans and Elizabeth Beans Gilbert