

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

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

**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](mailto: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 15<sup>th</sup> 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**

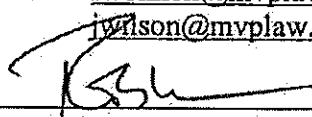
<b>KENNETH SNYDER,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 12-CV-2723 JAR/DJW</b>
	)	
<b>WILLIAM JOHNSON, et al</b>	)	
	)	
<b>Defendants.</b>	)	

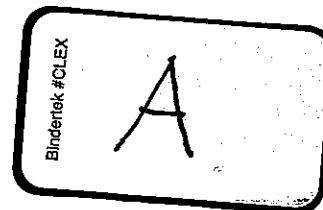
**OFFER OF JUDGMENT**

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](mailto:rwonnell@mvplaw.com)  
[jsievec@mvplaw.com](mailto:jsievec@mvplaw.com)

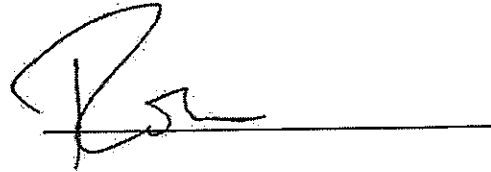
By:   
Robert J. Wonnell #20727  
Jane Sieve-Wilson #23837  
*Attorneys for Defendants*



**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 1<sup>st</sup> day of August, 2013.

Luanne Leeds  
LEEDS LAW, LLC  
515 SW Horne Street, Ste. 201  
Topeka, KS 66606  
[leedslua@gmail.com](mailto: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

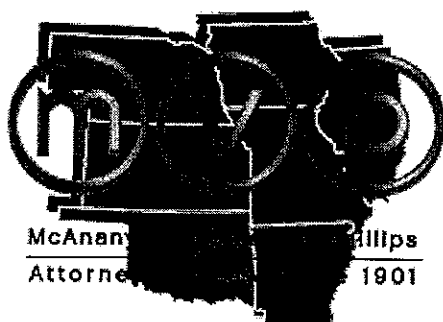
On Fri, Aug 2, 2013 at 10:26 AM, Robert J. Wonnell <[rwonnell@mvplaw.com](mailto:rwonnell@mvplaw.com)> wrote:

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



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---

**From:** Lisa D. Loveless  
**Sent:** Friday, August 02, 2013 10:22 AM  
**To:** '[leedslua@gmail.com](mailto:leedslua@gmail.com)'  
**Cc:** '[slater.kendra@gmail.com](mailto: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.

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Kansas City, KS 66103

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[lloveless@mvplaw.com](mailto:lloveless@mvplaw.com)

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