

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

EDELSON PC, an Illinois professional corporation, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

Case No. 1:16-cv-11057

THE BANDAS LAW FIRM PC, a Texas professional corporation, CHRISTOPHER BANDAS, an individual, LAW OFFICES OF DARRELL PALMER PC d/b/a DARRELL PALMER LAW OFFICE, a suspended California professional corporation, JOSEPH DARRELL PALMER, an individual, NOONAN PERILLO & THUT LTD., an Illinois corporation, C. JEFFERY THUT, an individual, GARY STEWART, an individual, and JOHN DOES 1-20,

Defendants.

**DEFENDANT THE BANDAS LAW FIRM PC's AND CHRISTOPHER BANDAS'  
MOTION FOR ENTRY OF JUDGMENT**

NOW COMES Defendants, the Bandas Law Firm PC and Christopher Bandas (collectively, the "Bandas Defendants"), and pursuant to Federal Rule of Civil Procedure 58, respectfully move the Court for an entry of judgment against the Bandas Defendants for the entire relief sought by the Plaintiffs in the only remaining Count of Plaintiff's First Amended Class Action Complaint and Demand for Jury Trial--Count V ("Complaint"). In support thereof, the Bandas Defendant state as follows:

1. On August 10, 2018, the Bandas Defendants served the Plaintiffs within an Offer of Judgment pursuant to Federal Rule of Civil Procedure 68 "allowing Judgment to be

entered against them in this action finding that they engaged in ‘the unauthorized practice of law in Illinois’ and further that the Court enter an order ‘enjoining Christopher Bandas in the Bandas Law Firm P.C. from the further practice of law in Illinois unless and until they obtain authorization from the Supreme Court Illinois to practice law,’ as well as for judgment for the ‘cost of then accrued,’ by the Plaintiffs, to be determined by the Court pursuant to FRCP 54, not including any attorney’s fees.” (*See* Offer of Judgment attached as Exhibit A.)

2. Pursuant to FRCP 68, the Plaintiff had 14 days to accept the Bandas Defendants’ Offer of Judgment, or until August 27, 2018.
3. Plaintiffs have not accepted the Bandas Defendants Offer of Judgment.
4. Pursuant to FRCP 58, the Bandas Defendants move this Court for entry of Judgment against them for all of the relief sought against them in the sole remaining count of Plaintiff’s Complaint, Count V, finding that “the Bandas Law Firm PC and Christopher Bandas engaged in the unauthorized practice of law in Illinois” and ordering that the Bandas Law Firm PC and Christopher Bandas are enjoined “from the further practice of law in Illinois unless and until they obtain authorization from the Supreme Court of Illinois to practice law.”
5. The Bandas Defendants further move this Court for the entry of Judgment against them to pay the Plaintiffs the “costs then accrued” to be determined by the Court pursuant to FRCP 54, not including attorney’s fees.

**WHEREFORE**, the Bandas Defendants respectfully request the Court to enter an Order of Judgment against them for all of the relief sought in Count V of the Complaint and for the payment of Plaintiff’s costs then accrued.

Respectfully submitted,

CHRISTOPHER BANDAS and BANDAS  
LAW FIRM PC

By: /s/ Darren VanPuymbrouck  
One of Their Attorneys

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Dated: September 4, 2018

**CERTIFICATE OF SERVICE**

By my signature below, I hereby certify that on September 4, 2018, I electronically filed the foregoing Motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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