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7 Attorneys for Plaintiffs
8 ESTATE OF BRYAN DEBBS
9 and SHELLEY DEBBS

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO DIVISION

12 ESTATE OF BRYAN DEBBS, et al.,
13 Plaintiffs,
14 vs.
15 COUNTY OF SACRAMENTO, et al.,
16 Defendants.

Case No. 2:20-cv-01153-DC-SCR

**PLAINTIFFS' NOTICE OF ACCEPTANCE
OF DEFENDANTS' OFFER OF JUDGMENT**

17 PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 68(a), Plaintiffs have
18 accepted and provide notice that they have accepted Defendants offer of judgment dated January 17,
19 2025. A true and correct copy of Defendants' offer of judgment which has been accepted by Plaintiffs is
20 attached as "Exhibit A."

21 Dated: February 6, 2025

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

22 

23 By: _____
24 Mark E. Merin
25 Paul H. Masuhara

26 Attorneys for Plaintiffs
27 ESTATE OF BRYAN DEBBS
28 and SHELLEY DEBBS

EXHIBIT A

LONGYEAR, LAVRA & CAHILL, LLP
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Attorneys for Defendants,
County of Sacramento, Sacramento County
Sheriff's Department and Sheriff Scott Jones

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION

ESTATE OF BRYAN DEBBS AND
SHELLEY DEBBS AND RIGOBERTO
ARRIAGA

Plaintiffs

v.

COUNTY OF SACRAMENTO,
SACRAMENTO COUNTY SHERIFF'S
DEPARTMENT, SCOTT R. JONES and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 2:20-CV-01153-DC-SCR

**DEFENDANTS' RULE 68 OFFER OF
JUDGMENT**

Defendants hereby jointly offer to allow entry of judgment pursuant to Rule 68 of the
Federal Rules of Civil Procedure as follows:

Judgment in favor of Plaintiffs: \$600,000.00.

The foregoing sum shall include all costs and attorneys' fees otherwise recoverable in
this action. The offer is conditioned on acceptance by all Plaintiffs and those otherwise able to
make a claim for damages because of the death of Bryan Debbs.

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1 This Offer is made for the purpose specified in Rule 68 and is not to be construed as an
2 admission of liability, fault, wrongdoing, illegal conduct or unconstitutional acts by these
3 Defendants or that Plaintiffs have suffered any injuries or damages by any act or failure to act by
4 these Defendants.

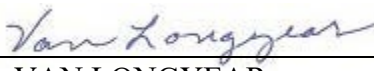
5 If this Offer is accepted, Plaintiffs will cause to be filed a stipulation for voluntary
6 dismissal, with prejudice, as to the ENTIRE ACTION and/or such other or further documents as
7 may be required to finally and forever dismiss all claims against all parties, named or unnamed,
8 in this action.

9 The Plaintiffs also agrees to sign a Release in a form that is usual and customary. The
10 form shall be approved by all counsel.

11 To accept this Offer, Plaintiffs must serve a written acceptance thereof by close of
12 business on February 7, 2025.

13
14 Dated: January 17, 2025

LONGYEAR, LAVRA & CAHILL, LLP

15
16 By: 
17 VAN LONGYEAR
18 NICOLE M. CAHILL
19 ASHLEY M. CALVILLO
20 Attorneys for Defendants,
21 County of Sacramento, Sacramento
22 County Sheriff's Department and Sheriff
23 Scott Jones
24
25
26
27
28

PROOF OF SERVICE

CASE TITLE: *Estate of Bryan Debbs, et al v. County of Sacramento, et al.*
COURT: USDC Eastern District of California
CASE NO: 2:20-CV-01153-DC-SCR

I am employed in the County of Sacramento. I am over the age of eighteen years and not a party to the within above-entitled action. My business address is 555 University Avenue, Suite 280, Sacramento, CA 95825.

I am familiar with this office’s practice whereby the mail is sealed, given the appropriate postage and placed in a designated mail collection area. Each day’s mail is collected and deposited in a United States mailbox after the close of each day’s business.

On January 17, 2025, I caused the following to be served:

DEFENDANTS’ RULE 68 OFFER OF JUDGMENT

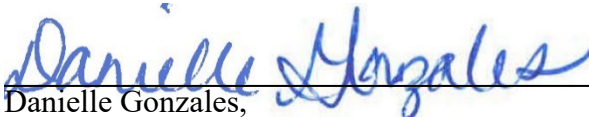
XX United States Mail - on all parties in said action by placing a true copy of the above-described document(s) enclosed in a sealed envelope in the designated area for outgoing mail addressed as set forth below.

ATTORNEYS FOR PLAINTIFFS

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Paul H. Masuhara, SBN 289805
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XX FEDERAL: I declare that I am employed in the office of a member of the bar of this Court at whose direction service was made.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on January 17, 2025, at Sacramento, California.


Danielle Gonzales,
Employee of Longyear, Lavra & Cahill, LLP