

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
(EAST ST. LOUIS)

JESSE WARD

Plaintiff,

- against -

CONSEQUENCE HOLDINGS, LLC

Defendant.

Docket No. 3:18-cv-01734 (NJR-MAB)

**DECLARATION OF  
RICHARD LIEBOWITZ**

I, RICHARD LIEBOWITZ, hereby declares under the penalty of perjury that the following statements are true and correct to the best of my personal knowledge.

1. I am counsel for Plaintiff Jesse Ward (“Plaintiff”) in this action.
2. I submit this declaration in support of Plaintiff’s motion for an entry of an order establishing a one-year (12-month) payment plan concerning my and my firm’s obligation to pay monetary sanctions as per the Court’s order, dated May 7, 2020 which awarded Defendant Consequence Holdings, LLC (“Defendant” or “Consequence Holdings”) \$10,000 in attorneys’ fees and costs pursuant to the Court’s inherent powers, as well as imposed \$10,000 in sanctions against me and my law firm, payable to the Clerk of Court. [Dkt. #39]
3. Liebowitz Law Firm, PLLC is a small, boutique law firm located in Valley Stream, New York. I am the sole and founding member of the firm and I employ two other lawyers.
4. Due to the small nature of the Firm, coupled with concerns about the present public health crisis, we are unable to pay the \$20,000 monetary sanction at one

time. We would appreciate the Court's assistance in setting a reasonable installment payment plan of twelve (12) months in order to comply with the Court's order.

5. Under the proposed terms of the installment plan, my firm would pay \$1666.66 per month, half of which shall be paid to the Clerk of Court and the other half to be paid to Defendant each month for 12 months, beginning at a reasonable time after the Court has disposed of the present motion.

6. Neither Defendant nor the Clerk of Court will suffer any prejudice if the Court grants the requested relief.

7. This motion is the first request made for a payment installment plan.

Dated: June 5, 2020

Valley Stream, NY

Respectfully submitted,

**s/richardliebowitz/**  
Richard Liebowitz, Esq.