

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)

**MOTION TO SET ONE-YEAR
INSTALLMENT PAYMENT PLAN**

PLEASE TAKE NOTICE, that Plaintiff Jesse Ward (“Plaintiff” or “Ward”), via counsel, respectfully moves the Court for an entry of an order establishing a one-year (12-month) payment plan concerning Plaintiff’s counsel’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 Plaintiff’s counsel, Richard Liebowitz, payable to the Clerk of Court. [Dkt. #39]

For the reasons stated in the accompanying declaration of Richard Liebowitz, and in the furtherance of equity and justice, Plaintiff’s counsel respectfully seeks a one-year (12-month) installment plan, or monthly payments of \$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.

Respectfully submitted,

LIEBOWITZ LAW FIRM, PLLC

s/richardliebowitz/

Richard Liebowitz, Esq.
11 Sunrise Plaza, Ste. 305
Valley Stream, NY 11580

Counsel for Plaintiff Jesse Ward

CERTIFICATE OF SERVICE

The undersigned certifies that on June 5, 2020, a true and correct copy of the foregoing motion for an installment plan was served by CM/ECF on counsel of record below:

Dan Booth, Esq.
Dan Booth Law LLC
60 Thoreau Street #121
Concord, MA 01742
dan@danboothlaw.com

*Counsel for Defendant
Consequence Holdings, LLC*

s/richardliebowitz/
Richard Liebowitz, Esq.