

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

JAMES J. CONDON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 3:24-cv-00063 (NKM/JCH)
	)	
ASSOCIATED UNIVERSITIES, INC.	)	
	)	
Defendant.	)	

DEFENDANT’S FED. R. CIV. P. 68 OFFER OF JUDGMENT

Defendant Associated Universities, Inc. (“AUI” or the “Defendant”), by counsel, pursuant to Rule 68 of the Federal Rules of Civil Procedure, hereby offers to allow judgment to be taken against it in favor of the Plaintiff James J. Condon’s (“Dr. Condon” or the “Plaintiff”) as follows:

- 1) The party making the Offer of Judgment is Associated Universities, Inc.;
- 2) The Offer of Judgment is being made to the Plaintiff James J. Condon;
- 3) Judgment shall be entered against AUI in the amount of (a) One Hundred Thirty Thousand and 00/100 Dollars (**\$130,000.00**) for any and all claims that could be asserted by Plaintiff in this action including for compensatory, punitive, or other damages, or back pay, front pay, or other equitable relief, plus (b) Plaintiff’s reasonable attorney’s fees to be determined by the court (acknowledging that Plaintiff’s attorneys’ fees were represented by Plaintiff’s counsel to total approximately \$50,000.00 as of January 2026);
- 4) The Judgment entered in accordance with this Offer of Judgment is to be in total settlement of any and all claims by Plaintiff against Defendant, and said Judgment shall have no effect whatsoever except in settlement of those claims;
- 5) This Offer of Judgment is made solely for the purposes specified in Rule 68, and is not to be construed either as an

admission that the Defendant is liable in this action, or that the Plaintiff has suffered any damages; and

- 6) In accordance with Rule 68, if this Offer of Judgment is not accepted by Plaintiff within 14 days after service of the Offer, the Offer shall be deemed withdrawn and evidence of this Offer will be inadmissible except in any proceeding to recover costs. Plaintiff acknowledges that if Plaintiff does not accept this Offer of Judgment and the judgment finally obtained by Plaintiff is not more favorable than this Offer, then AUI may petition the Court for an award of AUI's costs incurred after making this Offer, including AUI's reasonable attorneys' fees incurred after making this Offer, in accordance with Rule 68 and as allowed by the law of this District.

ACCEPTED: _____
James J. Condon

DATE: _____

Respectfully submitted,
ASSOCIATED UNIVERSITIES, INC.



By: _____
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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February 2026, I caused to be served Offer of Judgment via electronic mail to the following counsel of record:

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