

**Josh Abrams** <abramslive@gmail.com>

Abrams v. Div. of Unemployment - Response to Motion to Amend Judgment

Josh Abrams <abramslive@gmail.com>Mon, Oct 13, 2025 at
6:03 PM

To: "Lauren Davison (She/Her)" <Lauren.Davison@coag.gov>

Cc: "Stephen Woolsey (He/Him)" <Stephen.Woolsey@coag.gov>, Denise Munger <Denise.Munger@coag.gov>

Thank you , I have received your objection and pointing out procedural missteps i would like to now attempt to correct;

I am writing as the pro se plaintiff in the above-captioned matter to confer in good faith pursuant to D.C.COLO.LCivR 7.1(a) before filing a reply to the State Defendants' Response to my Motion to Amend Judgment (ECF No. 56) and/or a motion for leave to file a Third Amended Complaint. As you know, the Court dismissed the case on September 2, 2025 (ECF Nos. 50, 51), and I filed a Rule 59(e) motion on September 22, 2025 (ECF No. 54), seeking vacatur based on clear legal errors, manifest injustice, and the applicability of Williams v. Reed (2025). Your response opposes this and my request for leave to amend. To potentially resolve or narrow these disputes without further litigation:

1. Would the State Defendants consent to vacating the judgment and allowing amendment, given Williams v. Reed's holding on federal jurisdiction over systemic UI due-process violations where state remedies are deficient or illusory?
2. Alternatively, do you oppose a Third Amended Complaint that would further cure alleged defects (e.g., clarifying prospective relief under Ex parte Young, limiting \$504 damages to deliberate indifference, withdrawing any retrospective claims, and emphasizing futility of state exhaustion due to absent notices/appealable routes for underpayment and ADA issues)?

3. If opposed, what specific changes or concessions might resolve your concerns regarding exhaustion, immunity, and futility?

I am available for a phone call to discuss your lingering questions or concerns but would appreciate a written response. Please let me know your availability or provide your position in writing. If I do not hear back, I will note in my certificate of conferral that I made this good-faith effort but received no response.

Thank you for your attention.

Sincerely,

Joshua Abrams

Pro Se Plaintiff

[Quoted text hidden]