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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KIMBERLY BEHZADI and JASON
RINDENAU, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

INTERNATIONAL CREATIVE
MANAGEMENT PARTNERS, LLC,

Defendant.

No: 14-cv-4382 (LGS)

**NOTICE OF MOTION FOR CONDITIONAL CERTIFICATION AND COURT-
AUTHORIZED NOTICE PURSUANT TO SECTION 216(b) OF THE FLSA**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Motion for Conditional Certification and Court-authorized Notice Pursuant to Section 216(b) of the FLSA, the Declaration of Rachel Bien ("Bien Decl.") and the exhibits attached thereto, and the Declarations of Plaintiffs Kimberly Behzadi and Jason Rindenau, Plaintiffs respectfully request that the Court enter an Order:

- (1) Conditionally certifying the following collective pursuant to 29 U.S.C. § 216(b):

All persons who have worked as interns for ICM between August 26, 2011 and the date of final judgment in this action, who were not paid the minimum wage for all hours worked, and who elect to join the action;

- (2) Approving Plaintiffs' proposed Collective Action Notice and Consent to Join form, attached as Exhibits C and D to the Bien Decl., and their proposed notice process;

- (3) Ordering ICM to produce a computer-readable data file within 20 days of any order granting conditional certification that contains the names, last-known mailing address(es), last-known telephone number(s), last-known email address(es), and social security numbers for all Collective Members;
- (4) Authorizing Plaintiffs to post the Collective Action Notice and a downloadable Consent to Join form on a stand-alone website; and
- (5) Ordering such further relief as the Court deems just and proper.

Dated: New York, New York
August 26, 2014

Respectfully submitted,
OUTTEN & GOLDEN LLP

By:

/s/ Rachel Bien
Rachel Bien

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