



*Advocates for Workplace Fairness*

September 2, 2014

**By ECF**

The Honorable Lorna G. Schofield  
United States District Court  
For the Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Behzadi v. International Creative Management Partners, LLC*  
No. 14 Civ. 4382 (LGS)

Dear Judge Schofield,

We represent the Plaintiffs in the above-referenced matter. We write with Defendant's consent to request a three-day extension from September 23, 2014 to September 26, 2014 of Plaintiffs' deadline to file their Reply in Support of the Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216(b) of the FLSA ("Reply Brief").

Plaintiffs request an extension because Defendant has informed Plaintiffs that it intends to move to dismiss the First Amended Complaint and has sought Plaintiffs' consent to file its motion on September 5, 2014, three days after the current September 2, 2014 deadline. If Plaintiffs agree to Defendant's request, Plaintiffs' opposition to the motion would be due on September 19, 2014.

The three additional days that Plaintiffs request for their Reply Brief will allow them to accommodate Defendant's request for an extension while still having sufficient time to draft their opposition to Defendant's motion to dismiss by September 19th and their Reply Brief by September 26th. This is Plaintiffs' first request for an extension.

We thank the Court for its consideration of Plaintiffs' request.

Respectfully submitted,

A handwritten signature in black ink that reads "Rachel Bien".

Rachel Bien

cc: Elise M. Bloom, Esq. (By ECF)  
Steven D. Hurd, Esq. (By ECF)  
Michelle A. Annese, Esq. (By ECF)  
Sally J. Abrahamson, Esq.