



Advocates for Workplace Fairness

December 23, 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 jointly with Defendant to inform the Court that the parties have agreed to the key terms of a settlement that they intend to submit to the Court for its approval after they draft and sign a comprehensive settlement agreement. The parties respectfully request the Court stay all current deadlines pending their submission of a motion for preliminary settlement approval.

We thank the Court for its consideration of our 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.