



3000 Marcus Avenue, Suite 3E07
Lake Success, New York 11042
Tel (516) 986-2500 • Fax (516) 986-2501
www.lawyersAB.com

Rocco G. Avallone *
Christopher F. Bellistri
Alexander Tapia

OF COUNSEL
Joseph M. Ajello **
Ilya Mordukhaev

*MEMBER OF NY AND CT BAR
**MEMBER OF NY AND NJ BAR

August 27, 2014

Hon. Margo K. Brodie
U.S. District Court Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Hon. Joan M. Azrack
U.S. Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: Kane v. CNN, et al
Case Action No.: 14-CV-03187

Your Honor:

This office represents the Plaintiff in regards to the above referenced matter. The parties have tentatively reached a settlement in principle however, we are awaiting a formal acknowledgement of the global settlement (Federal Case and Workers' Compensation Case) with the Plaintiff's Workers Compensation attorney who was just recently retained and has not had the opportunity to review the workers' compensation file in order for him to give his approval of the global settlement.

As such, the parties respectfully request that the conference that is currently scheduled for September 4, 2014 with Magistrate Judge Azrack be adjourned for 30 days so that the workers comp. attorney can review the file and be able to properly approve the settlement.

Furthermore, I will consent to extend the Defendants' time to Answer the Complaint to September 25, 2014 should the settlement not be approved by the workers' comp. attorney or to whatever date this court deems proper.

Should the workers' comp. attorney approve the global settlement, Plaintiff will immediately notify this court and file the appropriate stipulation to document the resolution of the case.

Thank you for your anticipated consideration of these requests.

Sincerely,

A handwritten signature in cursive script that reads "Rocco G. Avallone".

Rocco G. Avallone, Esq.

cc: Susan Friedfel, Esq.