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March 1, 2016

**VIA ECF AND FAX- 212-805-6737**

Hon. George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, NY 10007

**Re: Cargian v. Breitling USA, Inc.  
Civil Action No.: 15-cv-01084**

Your Honor:

We represent defendant Breitling USA, Inc. ("Breitling") in the above-referenced matter. We write with the consent of plaintiff's counsel, and at the suggestion of your court clerk, to inform the Court that, due to the fact that Breitling filed a motion for summary judgment on February 29, 2016 and the parties will be briefing the motion until April 11, 2016 (when the reply papers are due to be served and filed), there are no issues to raise with the Court at this time, and therefore the parties agree to adjourn the March 8, 2016 conference that is currently scheduled in this matter.

Respectfully submitted,

FOX ROTHSCHILD LLP

Zev Singer

CC: All Attorneys of Record (via ECF)  
Janice Goodman, Esq., via email