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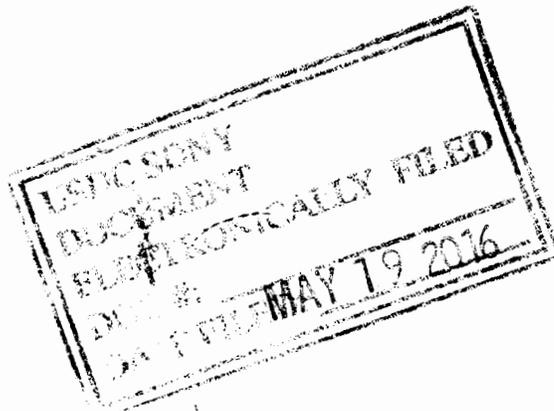
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May 10, 2016

VIA ECF and  
FAX (212-805-6737)  
Hon. George B. Daniels  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1310  
New York, N.Y. 10007



Re: Cargian v Breitling USA, Inc.  
15 CV 01084 (GBD, HP)  
Motion to Submit Post Argument Memo of Law

SO ORDERED:

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Dated: MAY 19 2016

Dear Judge Daniels:

On May 2, 2016 at oral argument on Defendant's summary judgment motion the Court extensively questioned Plaintiff on the elements of proof needed to establish a claim of sex stereotyping under Title VII under Dawson v Bumble & Bumble, and the extension of gender discrimination to include sexual orientation. I request permission to submit the attached supplemental letter memo of law to respond to some of your questions not previously addressed in the parties briefs. I reached out to Defendant's counsel who informed me that Defendant does not consent to supplemental briefing. No prior request has been made for this relief. Thank you.

Respectfully submitted

*Janice Goodman*  
Janice Goodman

cc: Glenn Grindlinger, Esq. (Via ECF & email)  
Zev Singer, Esq. (Via ECF & email)

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