

HINA SHAMSI
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July 31, 2015

VIA ECF

Hon. James Orenstein
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Raza v. City of New York*, 13 Civ. 3448 (PKC) (JO)

Dear Judge Orenstein,

Pursuant to this Court's June 22, 2015 order, Plaintiffs write on behalf of both parties in this matter to provide a status report concerning the parties' settlement efforts, and to request (a) further modification of the parties' confidentiality agreement dated August 15, 2014 (Dkt. No. 91), which was approved and ordered by the Court on August 18, 2014, and modified by order of the Court on June 29, 2015, and (b) an extension of the existing stay until September 1, 2015.

The parties' settlement efforts have continued, and only a few discrete items remain to be negotiated and finalized. Both parties anticipate being able to resolve these discrete items, and are working expeditiously to do so.

In order to facilitate both the Settlement Process and public filing and disclosure of settlement terms if and when they are finalized, the parties seek to modify paragraph 4 of the Court-ordered confidentiality agreement. Specifically, they ask the Court to order that (1) the parties' counsel are permitted to disclose negotiated terms and the basis for them to certain members of their staff, as agreed upon by the parties, and (2) if and when the settlement terms are finalized, then without further Court order, (a) those terms and any related information the parties agree upon shall be filed publicly on the docket in this matter for the Court's review and consideration, and (b) the parties' counsel and the parties shall be able to speak publicly about those terms and the negotiations that formed the basis of those terms. All other terms of the Court-ordered confidentiality agreement remain in place and shall remain in place.

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The parties respectfully request that the Court endorse or “so order” the above modification to the parties’ confidentiality agreement so that the Settlement Process may proceed, and so that the settlement terms may be publicly filed and disclosed if and when they become final. Relatedly, the parties request that the stay in this matter be extended to September 1, 2015.

We appreciate the Court’s attention to this matter.

Respectfully submitted,

Handwritten signature of Hina Shamsi in black ink.

Hina Shamsi
Counsel for Plaintiffs

AMERICAN CIVIL LIBERTIES
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Cc: The Honorable Pamela K. Chen (via ECF)
Defendants’ counsel (via ECF)