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June 6, 2016

VIA ECF

Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Sang v. Time Warner, et al*, 11-cv-02870 (AT)(JCF)

Dear Judge Torres:

We represent Plaintiff Sang Lan (“Plaintiff”) in this matter, and write pursuant to Rule III(a)(i) of Your Honor’s Individual Practices in order to respectfully request a pre-motion conference with the Court, in anticipation of Plaintiff’s motion for an order dismissing this action, with prejudice, under Rule 41(a)(2) of the Rules of Civil Procedure.

Prior to making this request, the undersigned conferred with Milo Silberstein, Esq., counsel for Kao-Sung Liu and Gin Hui-Hung Liu, and Hugh Mo, Esq., who represents himself in this matter, and proposed that the parties enter into a stipulation of dismissal with prejudice under Rule 41(a)(1)(A)(ii). Although Mr. Silberstein has informed us that his clients would agree to enter into a stipulation of dismissal with prejudice, we have been informed that Mr. Mo will not agree to said proposed stipulation. As such, we believe that motion practice will be necessary.

Having conferred with Mr. Silberstein and Mr. Mo, counsel for all parties can appear for a conference on June 15, 2016, at any time which is convenient for the Court. We thank the Court for its attention to the matters herein.

Respectfully,

/s/ John V. Golaszewski

John V. Golaszewski

Cc: All Counsel of Record (via ECF)