UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

CASE NO. 18-20283-CV-KING

ENRIQUE IGLESIAS, an individual,

Plaintiff

v.

UNIVERSAL INTERNATIONAL MUSIC, BV, a Dutch corporation, and INTERSCOPE RECORDS, a Delaware corporation,

Defendants.

NOTICE OF SETTLEMENT IN PRINCIPLE

Plaintiff, Enrique Iglesias, through counsel and with the consent of defendant Universal International Music BV ("Universal International"), hereby files this Notice of Settlement in Principle, and respectfully requests that this Court refrain from dismissing this matter for a lack of prosecution [D.E. 6], as the parties have been actively and diligently working on an amicable resolution since the filing of the Complaint.

In that the parties are presently negotiating a confidential settlement, which will resolve this action *in its entirety*, they respectfully request that the Court grant the parties thirty (30) days to finalize their confidential agreement. Moreover, in the unlikely event that the parties are unable to fully resolve this matter within the next thirty (30) days, Universal International has graciously agreed to voluntarily accept service of process, thereby shortening the time period that would ordinarily accompany service pursuant to the Hague Convention. Universal International's waiver of service of process will be filed shortly. This request is made in good faith, not for the purpose of delay and seeks to promote judicial economy.

Dated: April 18, 2018

Respectfully submitted,

<u>s/ James G. Sammataro</u> James G. Sammataro (Fla. Bar No. 520292) jsammataro@stroock.com <u>ksuarez@stroock.com</u> **STROOCK & STROOCK & LAVAN LLP** 200 S. Biscayne Boulevard, Suite 3100 Miami, Florida 33131 Telephone: (305) 358-9900 Facsimile: (305) 789-9302 *Attorney for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2018 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system and that a notice of the foregoing document is being served this day on all counsel of record identified via transmission of Notices of Electronic Filing generated by CM/ECF.

> By: /s/ James G. Sammataro James G. Sammataro