

# LEVI&KORSINSKY LLP

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July 8, 2020

## VIA ECF

Hon. Victor Marrero  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *Meyer v. United Microelectronics Corporation et al.*, No. 1:19-cv-02304-VM  
(S.D.N.Y.)**

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Dear Judge Marrero:

The parties write jointly to inform Your Honor that the parties have reached a settlement in this action following mediation with JAMS mediator Jed Melnick. On June 30, 2020, the parties executed a full stipulation of settlement (the “Stipulation”) agreeing to resolve this action, subject to Court approval, for \$3.0 million in cash in exchange for mutual releases and other standard terms (the “Settlement”). Pursuant to the terms of the Stipulation and Settlement, Plaintiff shall use best efforts to file the Motion for Preliminary Approval, attaching the Stipulation within twenty-one (21) calendar days of today but no later than July 30, 2010. The parties have been working on those papers and in fact left a voicemail message with Chambers last week to inform Your Honor the matter was settled.

Plaintiff’s Motion for Preliminary Approval will include a Proposed Order that will set forth a proposed schedule for, among other things, Notice to the Class, timing for the Final Approval hearing and submission of papers in support of the Settlement. In connection with preliminary approval of the Settlement, Plaintiffs will ask the Court to preliminarily certify, for purposes of the Settlement only, a settlement class pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure. Upon Final Approval, the case will be dismissed with prejudice.

In light of the Settlement, the parties request an immediate stay of all proceedings in this action pending the approval process.

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The parties are available for conference if the Court has any questions.

Very truly yours,

**LEVI & KORSINSKY, LLP**

*s/s Gregory M. Nespole*

Gregory M. Nespole

CC: James F. Moyle (via email)  
Jacob Englander (via email)

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