IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION CIVIL ACTION NO. 3:14-CV-577-RJC-DCK

US AIRLINE PILOTS ASSOCIATION,)
Plaintiff,)
v.)
ROGER VELEZ, and LEONIDAS, LLC,)
Defendants.)
)

NOTICE OF SETTLEMENT, JOINT MOTION FOR STAY, AND REQUEST TO SCHEDULE FAIRNESS HEARING

All parties to these consolidated cases, by their undersigned counsel, give notice that they have settled all of the consolidated cases in principle by entering into a Memorandum of Settlement.

Pursuant to the Memorandum of Settlement, the parties respectfully move the Court for entry of an Order:

- (i) Staying all current scheduling and filing deadlines, including without limitation, the deadlines for responses to the pending Motion to Dismiss Third-Party Complaints (Doc. No. 104) and Motion to Hold Defendants in Contempt (Doc. No. 105); and
- (ii) Scheduling a day and time during the week of May 2, 2016, or the week of May 9, 2016, for the Court to conduct a fairness hearing for the approval of the settlement in all respects by the Court.

In connection with the fairness hearing, the parties propose to submit on or before March 11, 2016, for the Court's approval, a proposed Notice of Settlement and Notice of Fairness Hearing to be sent to all class members.

WHEREFORE, the parties jointly ask the Court to stay all proceedings in these cases, schedule a fairness hearing during the week of May 2, 2016, or the week of May 9, 2016, and permit the parties to submit a proposed Notice of Settlement and Notice of Fairness Hearing to be sent to all class members.

This the 17th day of February, 2016.

/s/ Gary Silverman

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Counsel for Defendants Robert Frear, Paul Music, Ronald Nelson, and Paul DiOrio.

CERTIFICATE OF SERVICE

This is to certify that on this date a true and accurate copy of the foregoing Notice of Settlement, Joint Motion for Stay, and Request to Schedule Fairness Hearing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record in this matter via e-mail through CM/ECF.

This the 17th day of February 2016.

s/Robert A. Blake, Jr.

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