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May 20, 2021

**Via ECF**

Hon. Paul Austin Crotty  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Watch Tower Bible and Tract Society of Pennsylvania v. BMG Rights Management (US) LLC et al*, 20-cv-10844 (PAC)

Dear Judge Crotty,

We write to inform the Court that the parties have entered into a confidential settlement agreement resolving the claims set forth in the Complaint. Pursuant to the terms of the settlement agreement, plaintiff's counsel is expected to file a formal notice of dismissal no later than June 4, 2021. The current deadline for Defendants' response to the Complaint was May 19, 2021. In light of the parties' settlement, Defendants would like to avoid the cost associated with responding to the Complaint, and request (with the consent of counsel for Plaintiff) that no default be entered prior to June 4, 2021.

Respectfully submitted,

*/s/ David A. Munkittrick*

David A. Munkittrick

cc: All counsel (via ECF)