

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

JUANA CURRY and WILLIAM MOORE,
individually and on behalf of a class of similarly
situated individuals,

Plaintiffs,

CASE NO.: 1:10-cv-24513-JLK

v.

AVMED, INC., d/b/a AVMED, a Florida
Corporation,

Defendant.

JOINT NOTICE OF SETTLEMENT

Plaintiffs, individually and as representatives of a proposed Settlement Class, and Defendant AvMed, Inc. (“AvMed”) (Plaintiffs and AvMed are collectively referred to as the “Parties”), through their respective undersigned counsel, notify the Court that the Parties have reached an agreement in principle to settle this litigation in exchange for a full and complete release of all claims brought against AvMed in this putative Class Action, without admission of liability by AvMed, subject to preliminary and final approval of the Settlement and dismissal of the action with prejudice by the Court. The Settlement will be memorialized in a comprehensive written Settlement Agreement and related documents, which the Parties will endeavor to file with the Court as part of a motion for preliminary approval within 45 days.

Based on the foregoing, the parties respectfully request that all current deadlines set forth in the Order Setting Trial (ECF No. 54) be suspended pending the filing of the proposed Settlement Agreement. A proposed Order is attached.

WHEREFORE, the Parties respectfully request that the Court enter an Order suspending the deadlines in the Order Setting Trial for 45 days, setting a deadline for the Parties to file the

Settlement Agreement and motion for preliminary approval, and granting any further relief that the Court deems equitable and just.

Dated: September 3, 2013

Respectfully submitted,

EDELSON LLC

By: /s/ Ari J. Scharg
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