

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

CIVIL ACTION NO:
1:13-CV-21666-KMW

NORMA RODRIGUEZ,
MAYKEL RUZ, ROMMY SANCHEZ,
and YANISLEYDIS CAPOTE,

Intervening Plaintiffs,

v.

DYNAMIC MEDICAL SERVICES, INC.
_____ /

JOINT NOTICE OF SETTLEMENT¹
(As to Intervening Plaintiffs and Dynamic Medical Services, Inc. only)

Intervening Plaintiffs, Norma Rodriguez, Maykel Ruz, Rommy Sanchez and Yanisleydis Capote (hereinafter, collectively as “Intervening Plaintiffs”), and Defendant, DYNAMIC MEDICAL SERVICES, INC., by and through their respective undersigned attorneys, hereby provide notice that after diligent and extensive negotiations, the parties have in good faith agreed to settle this matter as follows:

1. Defendant, Dynamic Medical Services, Inc., has tentatively reached a settlement with the Intervening Plaintiffs in this case;
2. This tentative settlement does not include claims brought forth by Plaintiff, Equal Employment Opportunity Commission (“EEOC”), although the EEOC and Defendant Dynamic are in the final stages of bringing their separate claims to a resolution as well.

¹ As of the date of the filing of this Notice, Plaintiff, Equal Employment Opportunity Commission (EEOC), is not part of this tentative settlement.

3. The parties are in the process of preparing all the necessary settlement documentation and will be filing a notice of dismissal, and any other necessary documents once they are finalized which is expected to be shortly.
4. Defendant Dynamic's deadlines to answer both complaints are today, December 9, 2013. The last order from the Court indicated that no further extensions of time to answer would be entertained. Accordingly, this is also to advise the Court that the matter is resolved by and between the Intervening Plaintiffs and Defendant and almost resolved among all parties and will be completely resolved in the next couple of weeks. The parties are appreciative of the Court's flexibility in connection with the parties resolving this matter.

Dated: December 9, 2013

Respectfully submitted,

By: /s/ Zandro E. Palma
Zandro E. Palma, Esq.
Florida Bar No.: 0024031

By: /s/ Brian D. Buckstein
Brian D. Buckstein, Esq.
Florida Bar No.: 0618934

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 9, 2013, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

Dated: December 9, 2013

Respectfully submitted,

By: /s/ Brian D. Buckstein

Brian D. Buckstein, Esq

Florida Bar No.: 0618934

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