

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:23-cv-00910-DDD-KLM

JEFFREY PAN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

ATLAS REAL ESTATE GROUP, LLC,

Defendant.

NOTICE OF SETTLEMENT

Notice is hereby given that Plaintiff Jeffrey Pan ("Plaintiff") and Defendant Atlas Real Estate Group LLC ("Defendant") (together with Plaintiff, the "Parties"), have reached a settlement in principle. The Parties are in the process of preparing a written settlement agreement and anticipate filing the appropriate preliminary approval papers within the next forty-five (45) days. Therefore, the Parties request that the Court vacate all other deadlines and the pending Motion to Dismiss, without prejudice, in this matter based on the Parties' settlement in principle and set a deadline for the motion for preliminary approval to be filed by April 15, 2024.

Dated: February 29, 2024

Respectfully Submitted,

/s/ Jill H. Fertel

Jill H. Fertel, Esquire *pro hac vice*
CIPRIANI & WERNER, P.C.
450 Sentry Parkway, Suite 200

Blue Bell, PA 19422
Telephone: 610-567-0700
jfertel@c-wlaw.com

Margaret L. Boehmer, Esquire
GORDON REES SCULLY
MANSUKHANI, LLP
555 17th Street, Suite 3400
Denver, CO 80202
Telephone: 303-534-5160
mboehmer@grsm.com

*Attorneys for Defendant Atlas Real
Estate Group LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 29, 2024 the Notice of Settlement was filed with the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

Jill H. Fertel

Jill H. Fertel, Esquire