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MEMO ENDORSED

September 14, 2006

VIA FACSIMILE

The Honorable Denny Chin
United States District Judge
500 Pearl Street, Room 1020
New York, New York 10007

Re: Hawaii-Pacific Apparel Group, Inc. vs. Cleveland Browns Football Company, LLC and National Football League Properties—04 CV 7863 (DC)

Dear Judge Chin:

In a letter to Your Honor dated September 2, 2006, counsel for Plaintiff/Counterclaim-Defendant Hawaii-Pacific Apparel Group, Inc. ("HP") notified the Court that the parties are on track to settle this matter. As it stands today, settlement negotiations are being drafted and should be finalized in the coming weeks.

At the scheduling conference on February 24, 2006, Your Honor ordered discovery in this matter to close on September 15, 2006. We write to respectfully request that Your Honor stay the close of discovery for thirty days. Counsel for HP joins in this request.

Respectfully submitted,

Approved
so ordered
[Signature]
USDJ 9/15/06

[Signature]

Jessica A. Rose

cc: Robert L. Raskopf, Esq.
Christine Karol Roberts, Esq.

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