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Zabell & Collotta, P.C.
1 Corporate Drive
Suite 103
Bohemia, New York 11716
Tel. 631-589-7242
Fax. 631-563-7475
www.Laborlawsny.com

Saul D. Zabell, Esq.
Email: SZabell@laborlawsny.com

February 1, 2022

VIA ELECTRONIC CASE FILING

The Honorable Katherine P. Failla
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Karen Wegmann v. Young Adult Institute, Inc., et al.
Case No. 1:15-CV-03815 (KPF)

Your Honor:

We are counsel for Plaintiff, Karen Wegmann, in the above-referenced matter. We write to advise the court that Defendants have failed to comply with Your Honor's February 14, 2020, order to commence payment to Ms. Wegman on January 25, 2022.

CONCLUSION

For the foregoing reasons, the Court awards Plaintiff a net annual annuity of \$274,339.09, to be paid in monthly installments commencing on January 25, 2022. The Court recognizes that this is a considerable supplemental benefit, particularly given the charitable organization for which Plaintiff worked, and yet it is the agreement these parties made. *Document 166 Filed 2/14/20 Page 10 of 11.*

We respectfully request that Defendants be Ordered to Show Cause as to why they should not be held in contempt based upon their failure to comply with the Court's Order. Additionally, Plaintiff now seeks leave from Your Honor to file an Amended Complaint alleging claims of retaliation under ERISA as well as discrimination and retaliation claims under Title VII, State and City Human Rights laws.

Respectfully submitted,

ZABELL & COLLOTTA, P.C.

Saul D. Zabell

cc: Client
Counsel of record (*via* Electronic Case Filing)

Before deciding on Plaintiff's application, the Court wishes to hear from Defendants. Accordingly, Defendants are ORDERED to file a response to the above submission on or before **February 4, 2022**.

Dated: February 2, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE