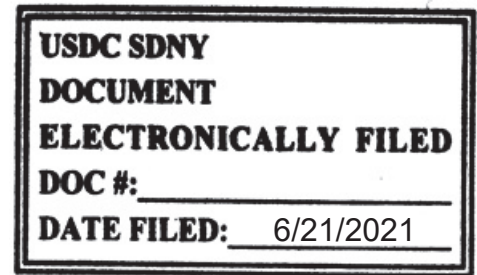



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June 18, 2021

**VIA ECF**

Honorable Robert W. Lehrburger, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Michael Dardashtian, et al. v. David Gitman, et al.*  
Docket No. 17-cv-4327 (LLS) (RWL)

Dear Hon. Robert W. Lehrburger:

By way of background, we are the attorneys for the Defendants, David Gitman, Accel Commerce, LLC, Dalva Ventures, LLC, Channel Reply, Inc. (collectively hereinafter referred to as “Defendants”), in the instant matter. It is understood that Dentons US LLP (“Dentons”) were former counsel of record for the Defendants before they were permitted to withdraw. Further, Dentons has asserted a charging or retaining lien on this case and the Court ordered Sim & DePaola LLP to hold monies we received in escrow until further order from the Court.

We are pleased to advise this Court that Dentons’ legal fees have been resolved by way of agreement, providing for the disbursement of funds to Dentons from my firm’s escrow account. Therefore, on consent from all parties, we are making a formal application for this order to be vacated or a new order issued by the Court permitting the funds to be withdrawn from our escrow account and distributed in accordance with the agreement between Dentons and Defendants .

Respectfully submitted,

/s/ Sang J. Sim  
Sang J. Sim, Esq.  
*Attorney for Defendants*  
[psim@simdepaola.com](mailto:psim@simdepaola.com)

Agreed and Accepted:  
Dentons US LLP



By: Edward Reich  
Partner and General Counsel

Request granted. Defense counsel may disburse the monies held in escrow pursuant to agreement with Dentons.

**SO ORDERED:**

06/21/2021



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**HON. ROBERT W. LEHRBURGER**  
**UNITED STATES MAGISTRATE JUDGE**