

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

Civil Action No. 16-cv-02002-WJM

OPEN STUDIOS, INC, a Colorado, Nonprofit Corporation

Plaintiff,

v.

BOULDER METALSMITHING ASSOCIATION, a Colorado, Nonprofit Corporation  
Defendant.

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**UNOPPOSED MOTION TO FOR SETTLEMENT AGREEMENT DISCUSSIONS**

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Defendant moves this Court to assist the parties in crafting a final settlement agreement. This motion is unopposed by Plaintiff.

**LOCAL RULE 7.1 CERTIFICATION**

Ms. Jahn contacted Mr. Bernstein to see if he would object to engaging in further discussions with the Magistrate Judge to assist the parties in crafting a final settlement agreement. Amber Reed, an Associate with Mr. Bernstein's office indicated Plaintiff will not oppose this motion.

During the parties settlement conference on October 13, 2016, the parties arrived at a draft settlement agreement which was to be finalized in a final settlement agreement. Ms. Jahn sent a draft of a settlement agreement to Mr. Bernstein for review and comment on October 25, 2016. [Doc 32-4] Other than a general objection to the draft of the final settlement agreement from BOMA, which somehow has become fodder for Plaintiff's motion to enforce the "draft" settlement agreement [Doc 29 -10],

Ms. Jahn has not received any redlines or other changes from Mr. Bernstein's office with respect to the draft of the final settlement agreement sent to him on October 25, 2016. Pursuant to this Court's Order dated October 27, 2016, the parties have until November 30, 2016 to file a dismissal of this action. Defendant seeks assistance from this Court in crafting a final settlement agreement so the parties may meet this Court's deadline.

Dated: November 20, 2016

Respectfully submitted,

**JAHN & ASSOCIATES, LLC**

s/Kirstin M. Jahn  
1942 Broadway Suite 314  
Boulder, CO 80302  
303-545-5128

Attorney for Defendant  
Boulder Metalsmithing Association

**CERTIFICATE OF SERVICE**

I certify that on November 20, 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which sent notification of such filing to Plaintiff's counsel at the following email address:

Howard Bernstein  
howard@bernsteinattorney.com

Dated: November 20, 2016

/s/ Kirstin M. Jahn  
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Attorneys for Defendant