# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

MEGANNE NATALE and CHELSEA CHENG, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

9199-4467 QUEBEC INC., d/b/a EARTH RATED,

Defendant.

Case No. 2:21-cy-6775-JS-SIL

Hon. Joanna Seybert

# PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

#### TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 23, 2024 at 10:30 a.m., before the Honorable Joanna Seybert, United States District Court Judge for the Eastern District of New York, at the Alfonse M. D'Amato Federal Building, 100 Federal Plaza, Courtroom 1030, Central Islip, New York 11722, Plaintiffs Meganne Natale and Chelsea Cheng, by and through Class Counsel, will move and hereby do move for an order: (i) finally approving the Class Action Settlement, and (ii) certifying the Settlement Class.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs will rely upon: (i) the accompanying memorandum of law in support; (ii) the Declaration of Max S. Roberts and the exhibits attached thereto; and (iii) the Declaration of Ryan Bahry of JND Legal Administration and the exhibits attached thereto.

A [Proposed] Order Granting Final Approval of Class Action Settlement and Entering Judgment is submitted herewith.

Dated: September 9, 2024

Respectfully submitted,

By: /s/ Max S. Roberts

Max S. Roberts

## **BURSOR & FISHER, P.A.**

Max S. Roberts 1330 Avenue of the Americas, 32nd Floor New York, NY 10019 Telephone: (646) 837-7150

Facsimile: (212) 989-9163 Email: mroberts@bursor.com

## **BURSOR & FISHER, P.A.**

L. Timothy Fisher (*Pro Hac Vice*) Brittany S. Scott (*Pro Hac Vice*) 1990 North California Blvd., Suite 940 Walnut Creek, CA 94596

Telephone: (925) 300-4455 Facsimile: (925) 407-2700 Email: ltfisher@bursor.com bscott@bursor.com

Class Counsel