

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

<p>MEGANNE NATALE and CHELSEA CHENG, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>9199-4467 QUEBEC INC., d/b/a EARTH RATED,</p> <p style="text-align: center;">Defendant.</p>
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Case No. 2:21-cv-6775-JS-SIL  
Hon. Joanna Seybert

**PLAINTIFFS’ NOTICE OF MOTION FOR ATTORNEYS’ FEES, COSTS, EXPENSES, AND SERVICE AWARDS**

**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) approving the payment of attorneys’ fees, costs, and expenses in the amount of \$275,000, (ii) granting Ms. Natale and Ms. Cheng service awards of \$5,000 each in recognition of their efforts on behalf of the Settlement Class, and (iii) awarding such other and further relief as the Court deems reasonable and just.

**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; (iii) the Declaration of Meganne Natale; and (iv) the Declaration of Chelsea Cheng.

A [Proposed] Order Granting Final Approval of Class Action Settlement and Entering Judgment that grants the aforementioned motion is submitted herewith.

Dated: September 9, 2024

Respectfully submitted,

By: /s/ Max S. Roberts  
Max S. Roberts

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

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*Class Counsel*