

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

CHAIM LERMAN, ROSLYN WILLIAMS,  
and JAMES VORRASI, individually and on  
behalf of others similarly situated,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Hon. Sterling Johnson, Jr.

15-cv-07381 (SJ) (LB)

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT AND APPROVAL OF NOTICE PLAN**

Plaintiffs Chaim Lerman, Roslyn Williams and James Vorrassi (collectively "Plaintiffs") respectfully move this Court for an Order preliminarily approving the proposed class action settlement ("Settlement"), approving the form of notice, and scheduling the final approval hearing as set forth in the Settlement Agreement attached as Exhibit 1 to the Declaration of Michael Grunfeld. Specifically, the Parties ask that the Court enter the proposed Order thereby (1) granting preliminarily approval of the Settlement Agreement; (2) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; (3) appointing JND Legal Administration ("JND") as Settlement Administrator and direct it to commence the notice plan; (4) appointing Huntington Bank to serve as Escrow Agent in connection with the proceeds of the Settlement; (5) setting a date for a Settlement Hearing and deadlines for the sending of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs' motion for final

approval of the Settlement, and the filing of Lead Counsel's application for attorneys' fees and expenses; and (6) conditionally certifying the Settlement Class.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Michael Grunfeld and the exhibits thereto, which are filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Significantly, Apple does not oppose the relief sought by this motion.

Dated: May 3, 2022

Respectfully submitted,

/s/ Michael Grunfeld  
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Michael Grunfeld  
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*Counsel for Plaintiffs and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this, the 3<sup>rd</sup> day of May, 2022, a true and correct copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Michael Grunfeld  
Michael Grunfeld