

**SUPREME COURT OF THE STATE OF NEW YORK
BRONX COUNTY**

FREDERICK MCKINLEY and
LISA VIZCARRA, individually and on behalf of
all others similarly situated,

Index No. 805260/2024E

Plaintiffs,

- against -

CONOPCO INC.
and UNILEVER UNITED STATES, INC.,

**PLAINTIFFS’ NOTICE OF MOTION AND MOTION FOR
FINAL CERTIFICATION OF THE SETTLEMENT CLASS;
FINAL APPROVAL OF THE CLASS ACTION SETTLEMENT;
PAYMENT OF ATTORNEY FEES AND REIMBURSEMENT OF EXPENSES TO CLASS COUNSEL;
AND,
PAYMENT OF SERVICE AWARDS TO THE CLASS REPRESENTATIVES**

**To: August Horvath
FOLEY HOAG LLP
1301 Avenue of the Americas, 25th Floor
New York, New York 10019
Telephone: 212-812-0344
Email: ahorvath@foleyhoag.com**

Counsel for Defendants Concopco, Inc. and Unilever United States, Inc.

PLEASE TAKE NOTICE that on November 21, 2024 at 9:30 a.m., Plaintiffs Frederick McKinley and Lisa Vizcarra (“Plaintiffs”) will move this Court in IAS Part 20 at the Bronx County Supreme Courthouse, located at 851 Grand Concourse, Bronx, New York 10451, for an order that grants final certification of the settlement class; final approval of the class action settlement; payment of attorney fees and reimbursement of expenses to the court-appointed Class Counsel; and, payment of service awards to the two Class Representatives.

PLEASE TAKE FURTHER NOTICE that in support of this application, Plaintiffs will rely upon the accompanying Memorandum of Law; the Affirmation of the Court Appointed Co-Lead Class Counsel; the Affirmation of Cameron R. Azari Regarding Implementation and Adequacy of Notice Plan; and all prior pleadings and proceedings in this matter.

Dated: October 22, 2024

Respectfully submitted,

REESE LLP

/s/Michael R. Reese

Michael R. Reese
Sue J. Nam
100 West 93rd Street, 16th Floor
New York, New York 10025
(212) 643-0500
mreese@reesellp.com

SHEEHAN & ASSOCIATES, P.C.

Spencer Sheehan
60 Cuttermill Rd Ste 412
Great Neck, New York 11021
(516) 268-7080

Court-Appointed Class Counsel