

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Tommie Copper Products Consumer  
Litigation

Lead Case No.: 7:15-cv-03183-AT

**NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT WITH TOMMIE COPPER INC., TOMMIE COPPER  
HOLDINGS, INC., THOMAS KALLISH, AND MONTEL WILLIAMS**

PLEASE TAKE NOTICE that on a date to be determined, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 1007, Plaintiffs William Lucero, Rhonda Boggs, Jerome Jeffy, and Sandy Kontura (“Plaintiffs”) will respectfully move this Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an entry of an Order: (1) granting preliminary approval of the Settlement; (2) conditionally certifying the Class on a nationwide basis; (3) designating William Lucero, Rhonda Boggs, Jerome Jeffy, and Sandy Kontura as Class Representatives, and appointing Plaintiffs’ counsel as counsel for the Class; (4) establishing procedures for giving notice to members of the Settlement Class; (5) approving forms of notice to Settlement Class Members; (6) mandating procedures and deadlines for exclusion requests and objections; (7) setting a date, time and place for final approval hearing; and (8) granting such other and further relief as the Court may deem just and proper.

This motion is based on this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Antonio Vozzolo in Support of Motion for Preliminary Approval of Class Action Settlement and exhibits annexed thereto; and the papers and pleadings on file.

WHEREFORE, Proposed Class Counsel respectfully request that the Court enter the proposed Order Preliminarily Certifying the Settlement Class, Granting Preliminary Approval of Settlement, and Approving Class Notice.

Dated: November 22, 2017

Respectfully submitted,

**VOZZOLO LLC**

By: /s/ Antonio Vozzolo

Antonio Vozzolo

345 Route 17 South

Upper Saddle River, New Jersey 07458

Telephone: (201) 630-8820

Facsimile: (201) 604-8400

Email: avozzolo@vozzolo.com

– and –

Nadeem Faruqi

**FARUQI & FARUQI, LLP**

685 Third Avenue, 26th Floor

New York, New York 10017

Telephone: (212) 983-9330

Facsimile: (212) 983-9331

Email: nfaruqi@faruqilaw.com

– and –

Ronald A. Marron (*pro hac vice*)

**THE LAW OFFICES OF**

**RONALD A. MARRON**

651 Arroyo Drive

San Diego, California 92103

Telephone: (619) 696-9006

Facsimile: (619) 564-6665

Email: ron@consumersadvocates.com

***Co-Class Counsel for Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2017, I caused true and correct copies of the foregoing to be filed with the Clerk of Court using the CM/ECF system and served via the CM/ECF system upon all counsel of record listed on the Mailing Information for Case No. 7:15-cv-03183-AT.

DATED: November 22, 2017

/s/ Antonio Vozzolo

Antonio Vozzolo