

**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

Judge: Hon. Analisa Torres

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**NOTICE OF MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT, AWARD OF ATTORNEYS' FEES AND EXPENSES,  
AND APPROVAL OF INCENTIVE AWARDS**

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**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on May 1, 2018 at 11:00 a.m., before the Honorable Analisa Torres, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, Plaintiffs William Lucero, Rhonda Boggs, Jerome Jeffy, and Sandy Kontura (collectively, "Plaintiffs"), by and through Class Counsel, will move and hereby does move for an Order: (1) finally approving the Settlement on the terms and conditions set forth in the parties' Class Action Settlement Agreement; (2) certifying a nationwide settlement class; (3) directing the parties and their counsel to implement and to consummate the Settlement; (4) awarding attorneys' fees; (5) providing for the reimbursement of expenses incurred in connection with this action; (6) awarding incentive awards to the Class representatives; and (7) granting such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that, in support of the motion, Plaintiffs will rely upon the accompanying memorandum of law in support thereof, the Declarations of Ronald A. Marron,

Nadeem Faruqi, and Antonio Vozzolo, with annexed exhibits; and the papers and pleading on file. A proposed order granting the requested relief was previously filed as an Exhibit to the Settlement Agreement, Dkt. No. 113, in connection with Plaintiff's Motion For Preliminary Approval Of Class Action Settlement. A courtesy copy of that proposed order will be filed herewith for the Court's convenience.

**PLEASE TAKE FURTHER NOTICE** that the undersigned hereby requests oral argument.

Dated: April 16, 2018

Respectfully submitted,

**VOZZOLO LLC**

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