

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROSEMARY QUINN and ALAN
DUCORSKY, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil Action No. 7:12-CV-8187-VB

**NOTICE OF UNCONTESTED MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and declarations, Plaintiffs Rosemary Quinn, and Alan Ducorsky will move this Court, before the Honorable Vincent L. Briccetti, United States District Judge, at the Honorable Charles L. Brieant, Jr. United States Courthouse, 300 Quarropas Street, White Plains NY as soon as counsel may be heard, pursuant to Federal Rules of Civil 23, for an Order:

1. Preliminarily approving the Class Action Settlement Agreement;
2. Preliminarily certifying a proposed Settlement Class for purposes of effectuating the Settlement;
3. Preliminarily designating Plaintiffs Quinn, Ducorsky, Guilin, and Eckler as representatives of the Settlement Class;
4. Appointing D. Greg Blankinship and the law firm Finkelstein, Blankinship, Frei-Pearson & Garber LLP, Elaine A. Ryan and the law firm Bonnett, Fairbourn, Friedman & Balint, P.C., and Stewart M. Weltman and the law firm Stewart M. Weltman, LLC as Lead Counsel for the Settlement Class;

5. Preliminarily approving the terms of the Settlement as set forth in the Settlement Agreement;

6. Approving the forms of notice and the methods of providing notice detailed in the accompanying memorandum of law and Declaration of Jeanne C. Finegan and directing that said forms of notice be provided to Settlement Class members in that manner;

7. Scheduling a Final Approval Hearing at which the request for final approval of the proposed Settlement, Plaintiffs' Counsel's application for an award of attorneys' fees and expenses, incentive awards to named Plaintiffs, and the entry of the Final Judgment and Order will be considered.

Defendant does not contest this motion.

Dated: White Plains, New York
May 19, 2014

FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP

By: /s/ D. Greg Blankinship
D. Greg Blankinship
1311 Mamaroneck Avenue
White Plains, New York 10605
Tel: (914) 298-3281
Fax: (914) 824-1561
gblankinship@fbglaw.com

BONNETT, FAIRBOURN, FRIEDMAN &
BALINT, P.C.

By: /s/ Elaine A. Ryan
Elaine A. Ryan (*pro hac vice* application to
be filed)
2325 E. Camelback Rd., Suite 300
Phoenix, Arizona 85016
Telephone: 602-274-1100
Fax: 602-798-5860

STEWART M. WELTMAN LLC

By: /s/ Stewart Weltman
Stewart Weltman (*pro hac vice*)
53 W. Jackson Blvd. Suite 364
Chicago, Il 60604
Telephone: 312-427-3600
Fax: 312-427-1850
(Of Counsel Levin Fishbein Sedran &
Berman)

Attorneys for Plaintiffs