

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

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JEANNIE PATORA, individually on behalf :  
of herself and on behalf of all others similarly :  
situated, :

*Plaintiff,* :

v. :

TARTE, INC. :

*Defendant.* :

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Case No.: 7:18-cv-11760-KMK

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT, PRELIMINARY CERTIFICATION OF SETTLEMENT  
CLASS, AND APPROVAL OF NOTICE PLAN**

Plaintiff Jeannie Patora (“Plaintiff”) respectfully moves 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 Jason P. Sultzer (“Sultzer Declaration”). Specifically, the Parties ask that the Court enter the proposed Order, thereby

1. granting Preliminary Approval of the Settlement;
2. approving the proposed Notice program;
3. appointing the Angeion Group as Settlement Administrator and directing it to commence the Notice Program;
4. conditionally certifying the proposed Class for the purposes of Settlement;
5. appointing Plaintiff as Class Representative for the Settlement Class and her counsel as Class Counsel for the Settlement Class; and
6. scheduling a Final Approval Hearing.

In support of this Unopposed Motion, Plaintiff relies on the attached Memorandum of Law, the Declarations of Jason Sultzer and Steven Weisbrot and their supporting exhibits, all documents filed therewith, and the arguments of counsel.

Respectfully submitted on this 24th day of January, 2019.

**THE SULTZER LAW GROUP P.C.**

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