

Allison M. Wuertz (N.J. No. 41862011)  
Phoebe A. Wilkinson (Pro Hac Vice Application Forthcoming)  
Daniel Petrokas (Pro Hac Vice Application Forthcoming)

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*Counsel for Defendant LG Electronics U.S.A., Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

PEDRO BRITO, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

LG ELECTRONICS USA, INC. AND  
LG ELECTRONICS INC.,

Defendants.

No. 2:22-cv-05777-JMV-JSA

**NOTICE OF MOTION AND  
DEFENDANT LG ELECTRONICS  
U.S.A., INC.'S MOTION TO  
COMPEL ARBITRATION**

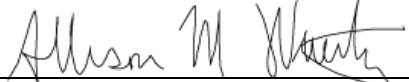
**PLEASE TAKE NOTICE** that, on December 19, 2022, at 10:00 a.m. or as soon thereafter as counsel may be heard by the above-entitled court, Defendant LG Electronics USA., Inc. (“LG”), will and hereby does move before the Honorable John Michael Vazquez, at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & United States Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order under the Federal Arbitration Act, 9 U.S.C. §§1-16, compelling arbitration of all causes of actions against it in the above-captioned matter;

**PLEASE TAKE FURTHER NOTICE** that, in support of this motion, LG shall rely on the accompanying brief along with the supporting Declaration of Alisa Baker, the supporting Declaration of Phoebe A. Wilkinson, and the exhibits thereto, all of which are incorporated by reference herein; and

**PLEASE TAKE FURTHER NOTICE** that LG requests that the Court enter the proposed Order attached hereto.

Dated: New York, New York  
November 14, 2022

**HOGAN LOVELLS US LLP**

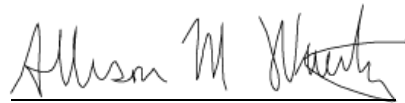
By:   
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### **CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2022, I caused a true and correct copy of the foregoing Notice of Motion and Defendant LG Electronics U.S.A., Inc.'s Motion to Compel Arbitration to be served, together with all materials in support thereof, on all counsel of record via the Court's electronic filing system.

A handwritten signature in black ink, appearing to read "Allison M. Wuertz", written over a horizontal line.

Allison M. Wuertz