

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
WHITEPLAINS DIVISION

RAY DU BOC ALI, IZELL MCCLOUD,	:	
and CLEMON WILLIAMS on behalf of	:	Case No.: 7:19-cv-06187-CS-PED
themselves and other similarly situated	:	
	:	
Plaintiffs,	:	
	:	Judge: Hon. Cathy Seibel
v.	:	Magistrate Judge: Paul E. Davison
	:	
COMBE INCORPORATED	:	
	:	
Defendant	:	
	:	

HENRY ALEXIS, et al.	:	
	:	Case No: 7:19-CV-10358-CS-PED
Plaintiffs	:	
	:	
v.	:	
	:	
COMBE INCORPORATED	:	Judge: Hon. Cathy Seibel
	:	Magistrate Judge: Paul E. Davison
Defendant	:	
	:	

ISRAEL E’ZION, et al.	:	
	:	Case No: 7:20-cv-070269-CS-PED
Plaintiffs	:	
	:	
v.	:	
	:	
COMBE INCORPORATED	:	Judge: Hon. Cathy Seibel
	:	Magistrate Judge: Paul E. Davison
Defendant	:	
	:	

JOINT MOTION TO APPROVE SETTLEMENT

Plaintiffs, clients of Burg Simpson Eldredge Hersh Jardine P.C. (“Burg Simpson”), together with Defendant Combe Incorporated (“Combe”), hereby provide notice to the Court that

they have reached a settlement of all claims of the above-named Plaintiffs, as well as certain other individuals represented by Burg Simpson who allege to have claims against Combe based on their use of Just For Men (“JFM”) hair dye. The Parties jointly request that the Court approve the Master Settlement Agreement (“MSA”) entered into by the parties, which establishes the BURG-JFM Resolution Program for the settlement of all claims of the Plaintiffs in this action, as well as certain other qualifying individuals as set forth in the MSA. This Court has authority to preside over and manage various aspects of the MSA and the BURG-JFM Resolution Program. All individuals who participate in the BURG-JFM Resolution Program have submitted to the jurisdiction of the Court and shall be bound by all orders of this Court.

The parties hereby submit, as Exhibit 1 to this Motion, a proposed Order Regarding Settlement Agreement, with Exhibit A, which outline the agreement and proposed settlement framework. The Parties request the Court grant this Motion and approve the settlement as outlined in Exhibit 1 and the attachments thereto.

Dated: April 15, 2021

Respectfully submitted,

/s/ Janet G. Abaray
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