

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

JENNIFER HASEMANN and DEBBIE HOTH,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

GERBER PRODUCTS CO.,

Defendant.

Civil Action No. 1:15-cv-02995-EK-RER

WENDY MANEMEIT, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

GERBER PRODUCTS CO.,

Defendant.

Civil Action No. 2:17-cv-00093-EK-RER

**UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Court-appointed class representatives Jennifer Hasemann and Wendy Manemeit, on their own behalf and that of the previously certified New York and Florida classes, now respectfully moves this Court for an order that: (1) grants preliminary approval of the proposed settlement agreement previously filed with the Court (ECF No. 281)(“Settlement Agreement”); (2) appoints Angeion Group, LLC as the Settlement Administrator in charge of notice and claims administration; (3) approves the form and manner of Notice to be provided to the Settlement Class as set forth in the Settlement Agreement and declaration of Steven Weisbrot of Angeion Group, LLC Re: Angeion Qualifications & Proposed Notice Plan filed simultaneously with this motion (“Angeion Declaration”); and (4) sets a date for a Final Approval Hearing either ninety (90) days from the issuance of the Court’s order granting preliminary approval of the settlement, of the first day thereafter that is available to the Court. In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law; the Declaration of Carlos F. Ramirez; and the Angeion Declaration.

Pursuant to section II.C of Your Honor’s Individual Rules and Practices in Civil Cases, a Microsoft Word version of a proposed Preliminary Approval Order is being simultaneously emailed to Your Honor.

Dated: March 5, 2025

Respectfully submitted,

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