

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

HOLLY WINSTON, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

PEACOCK TV LLC,

Defendant.

Civil Action No.: 1:23-cv-08191-ALC

Hon. Andrew L. Carter, Jr.

**NOTICE OF MOTION AND UNOPPOSED MOTION FOR ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that upon: (1) the accompanying Memorandum of Law, and (2) the Declaration of Neal J. Deckant, and the exhibits attached thereto (including the Parties' Class Action Settlement Agreement), Plaintiff Holly Winston, through her undersigned attorneys, will move this Court, before the Honorable Andrew L. Carter, United States District Court Judge, Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for an Order, pursuant to Federal Rule of Civil Procedure 23(e): (i) granting preliminary approval of the Class Action Settlement; (ii) provisionally certifying the Settlement Class under Federal Rule of Civil Procedure 23(b)(3) in connection with the settlement process; (iii) appointing Bursor & Fisher, P.A. and Gucovschi Rozenshteyn, PLLC as Class Counsel; (iv) appointing Holly Winston as the Class Representative for the Settlement Class; (v) approving the Notice Plan for the Class Action Settlement described

in the Class Action Settlement Agreement and its Exhibits, as well as the specific Notice of Class Action and Proposed Settlement (the “Proposed Notice”), attached as Exhibits B-D to the Settlement Agreement, and directing distribution of the Proposed Notice; (vi) establishing a schedule for dissemination of the notice of the settlement to Settlement Class Members, as well as the deadlines for Settlement Class Members to submit objections to or request exclusion from the settlement; (vii) setting a hearing for final approval of the settlement; and (viii) granting such other, further, or different relief as the court deems just and proper.

* * *

A Proposed Preliminary Approval Order is submitted herewith.

Dated: July 11, 2024

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Neal J. Deckant
 Neal J. Deckant

BURSOR & FISHER, P.A.

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