

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTINE ASIA CO., LTD., et al.,

Plaintiffs,

v.

JACK YUN MA, et al.,

Defendants.

No.: 1:15-md-02631-CM (SDA)

Related cases:

1:15-cv-00759-CM

1:15-cv-00811-CM

1:15-cv-00991-CM

1:15-cv-01405-CM

1:15-cv-05020-CM

1:15-cv-04991-CM

1:15-cv-05002-CM

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT AND APPROVAL OF
DISSEMINATION OF NOTICE TO THE CLASS**

Date: April 29, 2019

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD HEREIN:

PLEASE TAKE NOTICE that Class Representatives William Tai, Christine Asia Co., Ltd., Abel Amoros, Arthur Gabriel, Raymond Lee, and Gang Liu (collectively “Plaintiffs”), will hereby move this Court on a date and at such time as may be designated by the Honorable Colleen McMahon, Courtroom 24A, United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007 for an order: (i) granting Preliminary Approval of the Proposed Settlement; (ii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iii) setting a date for a final Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for final approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Laurence M. Rosen and the exhibits thereto (“Rosen Declaration”) filed simultaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion. The Stipulation and Agreement of Settlement (the “Stipulation”) is attached as Exhibit 1 to the Rosen Declaration. The Defendants, as defined in the Stipulation, do not oppose this motion.

Dated: April 29, 2019

THE ROSEN LAW FIRM P.A.

By: *s/ Laurence Rosen* _____

Laurence Rosen

Phillip Kim

275 Madison Avenue, 34th Floor

New York, NY 10016

Telephone: (212) 686-1060

Facsimile: (212) 202-3827

lrosen@rosenlegal.com

pkim@rosenlegal.com

Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On April 29, 2019, I served true and correct copies of the foregoing **PLAINTIFFS' NOTICE OF UNOPPOSED MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND APPROVAL OF DISSEMINATION OF NOTICE TO THE CLASS**, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 29, 2019, at New York, New York.

/s/ Laurence Rosen
Laurence Rosen