

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER**

JOHN FINN and SALVATORE J.
CONTRISTANO, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

EMPRESS AMBULANCE SERVICE, LLC,

Defendant.

Index No. 61058/2023

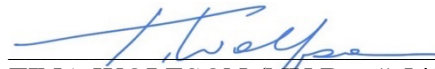
CLASS ACTION

**NOTICE OF MOTION FOR
PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

PLEASE TAKE NOTICE that upon: (i) the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement; (ii) the accompanying Declarations of Tina Wolfson, Anthony L. Parkhill, and Cameron Azari in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement; (iii) the Settlement Agreement and its accompany Exhibits; (iv) the proposed Preliminary Approval Order submitted herewith; (v) all the prior pleadings and proceedings heretofore and herein; and (vi) any other materials the Court wishes to consider, the undersigned will move this Court on September 8, 2023 at 9:30 a.m. at the Supreme Court of the State of New York County of Westchester located at 111 Dr. Martin Luther King Jr. Blvd, White Plains, NY 10601, or as soon thereafter as counsel may be heard, for an order pursuant to CPLR §§ 907 and 908: (i) granting preliminary approval to the proposed class action settlement; (ii) provisionally certifying the proposed Settlement Class; (iii) approving the proposed forms of notice to the Settlement Class, and the proposed plan for their dissemination; and (4) scheduling a Final Approval Hearing to determine whether to grant final approval to the proposed settlement.

Dated: June 16, 2023

Respectfully submitted,



TINA WOLFSON (NY Bar # 5436043)
DEBORAH DE VILLA (NY Bar # 5724315)
AHDOOT & WOLFSON, PC
521 5th Avenue, 17th Floor
New York, NY 10175
Telephone: 917-336-0171
Facsimile: 917-336-0177
twolfson@ahdootwolfson.com
ddevilla@ahdootwolfson.com

ANDREW W. FERICH*
AHDOOT & WOLFSON, PC
201 King of Prussia Road, Suite 650
Radnor, PA 19087
Telephone: 310-474-9111
Facsimile: 310-474-8585
aferich@ahdootwolfson.com

BEN BARNOW (NY Bar # 2253391)
ANTHONY L. PARKHILL*
BARNOW AND ASSOCIATES, P.C.
205 West Randolph Street, Ste. 1630
Chicago, IL 60606
Telephone: 312-621-2000
Facsimile: 312-641-5504
b.barnow@barnowlaw.com
aparkhill@barnowlaw.com

Proposed Class Counsel

* *pro hac vice* pending

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2023, I electronically filed the foregoing Notice of Motion for Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and the annexed (i) Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement; (ii) Declarations of Tina Wolfson, Anthony L. Parkhill, and Cameron Azari in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement; (iii) Settlement Agreement and its accompany Exhibits; and (iv) proposed Preliminary Approval Order, using the Court's CM/ECF system, which will send notifications of such filing to all counsel of record.



TINA WOLFSON