

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

JAMI KANDEL, MOCHA GUNARATNA, and  
RENEE CAMENFORTE, individually and on  
behalf of all others similarly situated,

Plaintiffs,

vs.

DR. DENNIS GROSS SKINCARE, LLC, a New  
York Limited Liability Company,

Defendant.

Case No. 1:23-cv-01967-ER

Honorable Edgardo Ramos

**NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT**

**CLARKSON LAW FIRM, P.C.**

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*Attorneys for Plaintiffs and the Settlement  
Class*

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on October 31, 2024, before the Honorable Edgardo Ramos, United States District Court Judge of the Southern District of New York, Plaintiffs Jami Kandel, Mocha Gunaratna, and Renee Camenforte (“**Plaintiffs**”), on behalf of themselves, the general public, and all others similarly situated, by and through their counsel Ryan J. Clarkson, Yana Hart, and Tiara Avanness of Clarkson Law Firm, P.C., (“**Clarkson**”) shall and hereby do move the Court, pursuant to Federal Rule of Civil Procedure 23, subdivision (e), for an order as follows:

- (1) granting final approval of the Settlement, finding it fair, reasonable, and adequate to the Class;
- (2) granting final certification of the Settlement Class;
- (3) granting Plaintiffs’ Motion for Award of Attorneys’ Fees and Costs and Service Awards;
- (4) directing the parties to undertake the obligations set forth in the Settlement Agreement that arise out of the Court’s final approval;
- (5) entering Final Judgment; and
- (6) maintaining jurisdiction over this matter for the purpose of enforcing the Final Judgment.

The Motion is based on this notice of motion; the concurrently filed memorandum of points and authorities; the declarations of Class Counsel Ryan J. Clarkson (“**RJC Decl.**”), Class Administrator Brandon Schwartz (“**Schwartz Decl.**”), Bryan Heller of ClaimScore (“**Heller Decl.**”), and all exhibits thereto; the parties’ Settlement<sup>1</sup> preliminarily approved on June 28, 2024;

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<sup>1</sup> The Settlement is attached as **Exhibit A** to the declaration of Ryan J. Clarkson.

all prior pleadings, orders, and proceedings; and any additional evidence and argument submitted in support of the Motion.

A proposed Final Approval Order and a Proposed Final Judgment are submitted herewith.

Dated: October 17, 2024

**CLARKSON LAW FIRM, P.C.**

/s/ Ryan J. Clarkson

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