

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

HILARY REMIJAS and JOANNE KAO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

THE NEIMAN MARCUS GROUP, LLC, a
Delaware limited liability company,

Defendant.

Case No. 1:14-cv-01735

Hon. Sharon Johnson Coleman

AGREED MOTION SEEKING PERMISSION TO EXCEED PAGE LIMITATION

Plaintiffs Hilary Remijas and Joanne Kao (“Plaintiffs”), by and through their attorneys, respectfully move for an extension of the fifteen-page limit applicable to their Motion for Final Approval of Class Action Settlement and Motion for Attorneys’ Fees, Costs, and Class Representative Service Awards (collectively, the “Motions”). In support of this motion, Plaintiffs state as follows:

1. Plaintiffs respectfully submit that in order to properly explain to the Court the details of the proposed class-wide Settlement, and present the adequacy of the class notice program, and present the merits of certifying the class for settlement purposes, thirty (30) pages are required. Plaintiffs believe that in a Memorandum of this complexity and consequence to the proposed class, exceeding the fifteen-page limitation will benefit the Court’s consideration of the substantial rights

and remedies that Plaintiffs' Motion seeks on behalf of the proposed class. Plaintiffs submit that in these circumstances, it is fair and consistent with the interests of justice to allow for a brief of this length in support of a Motion for Final Approval of Class Action Settlement.

2. Plaintiffs' Motion for Attorneys' Fees, Costs, and Class Representative Service Awards requires a similar explanation of the lengthy proceedings leading to the present Settlement, as well as a discussion of the various factors the Court is required to consider when awarding fees in connection with such a class action settlement under the Federal Rules and judicial precedent.

3. There is no prejudice to Defendant Neiman Marcus, and Daniel Craig, counsel for Defendant, represented to Robert Ahdoot, counsel for Plaintiffs, that Defendant does not oppose this motion.

4. In light of the foregoing, Plaintiffs respectfully request that they be granted leave to file a 30-page Motion for Final Approval of Class Action Settlement, and 20-page Motion for Attorneys' Fees, Costs, and Class Representative Service Awards.

WHEREFOR, Plaintiffs respectfully request that this Court enter an order permitting them to file a 30-page Motion for Final Approval of Class Action Settlement, and 20-page Motion for Attorneys' Fees, Costs, and Class Representative Service Awards.

Dated: May 1, 2020

Respectfully submitted,

/s/ Theodore Maya

Tina Wolfson

twolfson@ahdootwolfson.com

Robert Ahdoot

rahdot@ahdootwolfson.com

Theodore W. Maya

tmaya@ahdootwolfson.com

AHDOOT & WOLFSON, PC

10728 Lindbrook Drive

Los Angeles, California 90024

Tel: 310-474-9111; Fax: 310-474-8585

John A. Yanchunis
jyanchunis@forthepeople.com
MORGAN & MORGAN
COMPLEX LITIGATION DEPARTMENT
201 North Franklin Street, 7th Floor
Tampa, FL 33602
Tel: 813-275-5272; Fax: 813-226-5402

Joseph J. Siprut
jsiprut@siprut.com
SIPRUT PC
17 North State Street, Suite 1600
Chicago, Illinois 60602
Tel: 312-236-0000; Fax: 312-878-1342

Settlement Class Counsel and Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that the foregoing Agreed Motion Seeking Permission to Exceed Page Limitation was filed electronically with the Clerk of the Court using the CM/ECF system on this 1st day of May, 2020 and served electronically on all counsel of record.

/s/ Theodore Maya
Theodore Maya