

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

AMANDA MARBLE and KELSEY REIMER,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

-against-

HALO INNOVATIONS, INC.

Defendant.

Case No. 1:23-cv-11048-JGLC

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

Plaintiffs Amanda Marble, Kelsey Reimer, and Cassidy Bender (“Plaintiffs” or “Class Representatives”), by counsel and on behalf of themselves and all others similarly situated, submit this Unopposed Motion for Preliminary Approval of Class Action Settlement. Plaintiffs and Defendant HALO Innovations, Inc.’s (n/k/a HALO Dream, Inc.) (“Defendant” or “HALO”) by counsel, have reached a proposed settlement (“Settlement Agreement and Release” or “Settlement”) in this proposed class action. Plaintiffs request the Court enter an Order:

1. Preliminarily approving the Settlement;
2. Preliminarily certifying the Settlement Class for purposes of settlement only;
3. Appointing proposed Class Counsel as Class Counsel and Plaintiffs as Class Representatives;
4. Approving the form and content of the Notices and Claim Forms attached as Exhibits A through D to the Settlement Agreement, which is attached as Exhibit 1 to Plaintiffs’ Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement;
5. Finding that the proposed procedures for dissemination of the Class Notice and Claim Form constitute the best notice practicable under the circumstances, and comply with due process and Fed. Rule Civ. P. 23; and

6. Setting a date and time for the Final Approval Hearing, at which the Court will consider final approval of the Settlement, Class Certification for purposes of the Settlement, and Class Counsel's application for attorneys' fees and expenses and Class Representatives' application for service awards.

In support of this Motion, Plaintiffs submit herewith: (1) Plaintiffs' Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement ("Memorandum"); (2) the Settlement Agreement, which is being submitted as Exhibit 1 to the Memorandum; (3) the Joint Declaration of Proposed Class Counsel, which is being submitted as Exhibit 2 to the Memorandum; (4) the Declaration of Steven Weisbrot of Angeion Group, which is being submitted as Exhibit 3 to the Memorandum; and (5) a [Proposed] Preliminary Approval Order.

For the reasons set forth more particularly in the accompanying Memorandum and supporting exhibits, Plaintiffs request that the Court grant this Motion.

DATED: January 31, 2025

Respectfully submitted,

**MILBERG COLEMAN BRYSON  
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*\*Application to be admitted pro hac  
vice is forthcoming*

***Attorneys for Plaintiffs and the  
Putative Class***