

**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 *UNOPPOSED* MOTION FOR PRELIMINARY 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 upon the accompanying Memorandum of Law in Support of Plaintiffs' *Unopposed* Motion for Preliminary Approval of Class Action Settlement, and the accompanying declarations and exhibits thereto, 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 Avanes of Clarkson Law Firm, P.C., shall and hereby do move the Court as soon as counsel may be heard, before the Honorable Edgardo Ramos, United States District Judge of the Southern District of New York, located at Thurgood Marshall U.S. Courthouse, 40 Foley Square, Courtroom 619, New York, NY 10007, pursuant to Federal Rule of Civil Procedure 23(e) for an order as follows:<sup>1</sup>

1. Provisionally certifying, for settlement purposes only, the Settlement Class;
2. Granting preliminary approval of the Settlement;
3. Appointing Ryan Clarkson, Yana Hart, and Clarkson Law Firm, P.C. as Class Counsel;
4. Appointing Plaintiffs Jami Kandel, Mocha Gunaratna, and Renee Camenforte as Class Representatives for the Settlement Class;
5. Approving the form and the manner of the Notice, and directing that the Notice be issued to the Settlement Class;
6. Appointing Postlethwaite & Netterville, APAC as the Class Administrator; and
7. Approving the proposed schedule of events in the Proposed Preliminary Approval Order and scheduling a Final Approval Hearing.

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<sup>1</sup> All capitalized terms used herein have the meanings set forth and defined in the Settlement Agreement (the "**Settlement**") dated June 24, 2024, and attached as Exhibit A to the Declaration of Ryan J. Clarkson ("**RC Decl.**"), filed concurrently herewith.

A Proposed Preliminary Approval Order is submitted herewith.

Dated: June 25, 2024

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

By: /s/ Ryan J. Clarkson  
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