

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CONNIE MCLENNAN, VIRGINIA
ZONTOK, CARYL FARRELL, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v

LG ELECTRONICS USA, INC.

Defendant.

Civil Action No. 10 CV 3604
(WJM)(MF)

**NOTICE OF JOINT MOTION
FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

TO: THE HONORABLE COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on September 16, 2011 at 11:00 a.m. or at a time and date to be otherwise set by the Court, the undersigned counsel for Plaintiffs and the Class shall move before the Honorable William J. Martini, U.S.D.J., at the Post Office and Courthouse Building, Federal Square, Newark, New Jersey for an Order granting preliminary approval of the settlement between Plaintiffs and Defendant. The Settlement Agreement is attached hereto as Exhibit 1 and a proposed form of order for preliminary approval of the settlement agreement is attached hereto as Exhibit 2.

The undersigned intend to rely upon the Settlement Agreement (and all exhibits thereto), the Declaration of Kristen Law Sagafi, and the Memorandum of Law filed herewith.

This Motion is unopposed. Oral argument is requested.

Dated: September 9, 2011

Respectfully submitted,
LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
By: /s/ Kristen Law Sagafi.
Kristen Law Sagafi
275 Battery Street, 30th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000

Jonathan D. Selbin
Jason Lichtman
LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Telephone: (212) 355-9500

James Cecchi
CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO
P.C.
5 Becker Farm Road
Roseland, NJ 07068
(973) 994-1700

Paul Kiesel
KIESEL BOUCHER LARSON, LLP
8648 Wilshire Boulevard
Beverly Hills, CA 90211-2910
(310) 854-4444
Plaintiffs' Counsel