

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

**NICOLE DICKENS, HALEH  
ALLAHVERDI, HALEY BURGESS,  
JILLIAN BLENIS, and LILI MITCHELL,**  
individually and on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

**THINX, INC.,**

Defendant.

**CASE NO. 1:22-cv-04286-JMF**

**PLAINTIFFS' NOTICE OF MOTION AND UNOPPOSED MOTION FOR AWARD OF  
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS**

**PLEASE TAKE NOTICE** that on May 24, 2023, at 3:30 p.m., by telephonic hearing in the U.S. District Court for the Southern District of New York before the Honorable Jesse M. Furman, Plaintiffs Nicole Dickens, Haleh Allahverdi, Haley Burgess, Jillian Blenis, and Lili Mitchell will, and hereby do, move the Court for an order granting payment of \$1,458,713.54 for Class Counsel's fees, \$28,786.26 for the reimbursement of litigation costs and expenses, and payment of \$2,500 to each of the named plaintiffs (for a total of \$12,500) for their efforts and contributions to this matter.

The motion is based upon this notice of the motion; the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards; the Joint Declaration of Class Counsel in Support of Plaintiffs' Unopposed Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Service

Awards; all the pleadings and documents on file in this action; and such other matters as may be presented at or before the hearing.

DATED: February 24, 2023

Respectfully submitted,

*/s/ Erin J. Ruben*

Erin J. Ruben\*

**MILBERG COLEMAN BRYSON PHILLIPS**

**GROSSMAN, LLP**

900 W. Morgan Street

Raleigh, NC 27603

P.O. Box 12638

Raleigh, NC 27605

eruben@milberg.com

Rachel Soffin\*

**MILBERG COLEMAN BRYSON PHILLIPS**

**GROSSMAN, LLP**

800 S. Gay Street, Suite 1100

Knoxville, TN 37929

rsoffin@milberg.com

Harper T. Segui\*

**MILBERG COLEMAN BRYSON PHILLIPS**

**GROSSMAN, LLP**

825 Lowcountry Blvd., Suite 101

Mt. Pleasant, SC 29464

hsegui@milberg.com

J. Hunter Bryson\*

**MILBERG COLEMAN BRYSON PHILLIPS**

**GROSSMAN, LLP**

405 E 50th Street

New York, NY 10022

Tel: (630) 796-0903

hbryson@milberg.com

*Attorneys for Plaintiffs and the Class*

*\*Admitted Pro Hac Vice*