

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

CHERRY LYN MICLAT and BENZOR
SHEM VIDAL, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

ADVANCED CARE STAFFING, LLC, and
PRIORITY CARE STAFFING, LLC,

Defendants.

Civ. No.: 23-cv-5296 (NRM)(MMH)

**NOTICE OF MOTION FOR ATTORNEYS' FEES, COSTS,
AND SETTLEMENT ADMINISTRATION EXPENSES**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 23(e), and upon (i) the Court's November 19, 2025 Order granting preliminary approval of the parties' settlement in this matter; (ii) the Settlement Agreement signed by all parties in this case; (iii) Plaintiffs' Memorandum of Law; (iv) the February 3, 2026 declarations of attorneys Patricia Kakalec, Hugh Baran, Joshua R. O'Neill, and Juno Turner; and (v) all other papers heretofore had in this matter, the undersigned counsel for Plaintiffs will move this Court, before the Honorable Nina Morrison, United States District Judge for the Eastern District of New York, at the United States Courthouse for the Eastern District of New York, Courtroom 6EN, 225 Cadman Plaza East, Brooklyn, NY 11201, on March 4, 2026 at 10:30 a.m. for an Order awarding Plaintiffs' requested attorneys' fees, costs, and settlement administration costs.

Dated: New York, New York
February 3, 2026

Respectfully Submitted,

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