

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

CAROLINE EDRI, BELLE DE SANTIAGO,
and **ANAMARI LAURENTZ**, on behalf of
themselves all others similarly situated,

Index No. 529489/2024

Plaintiffs,

-against-

**ADVANCED RECOVERY EQUIPMENT AND
SUPPLIES, LLC,**

Defendant.

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

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law, Plaintiffs Caroline Edri, Belle De Santiago, Anamari Laurentz, and Kerton Lemaine (“Class Representatives”) will move this Court at the Supreme Court of New York County of Kings located at 360 Adams Street, Brooklyn, New York, 11201 on February 17, 2026 at 9:30 a.m., or as soon thereafter as counsel may be heard, for entry of an Order (i) granting preliminary approval of the Parties’¹ proposed Settlement Agreement and Release, (ii) certifying the proposed Settlement Class for settlement purposes, (iii) approving the form and content of the Notice to the Settlement Class Members, (iv) appointing Caroline Edri, Belle De Santiago, Anamari Laurentz, and Kerton Lemaine as Class Representatives, (v) appointing Tyler J. Bean of Siri & Glimstad LLP, A. Brooke Murphy of Murphy Law Firm, Gary Klinger of Milberg, PLLC, and Jeff Ostrow of Kopelowitz Ostrow P.A

¹ All capitalized terms used and not otherwise defined herein have the definitions set forth in the Settlement Agreement, attached hereto as **Exhibit 1**.

as Class Counsel, (vi) setting deadlines for Settlement Class Members to object or opt out; and (vii) scheduling a Final Approval Hearing, at which time the Court can consider whether to give final approval to the settlement.

Dated: January 30, 2026

Respectfully submitted,

/s/ Sonal Jain

Sonal Jain (NY Bar No. 5855275)

Tyler J. Bean

SIRI & GLIMSTAD LLP

745 Fifth Avenue, Suite 500

New York, New York 10151

Tel: (212) 532-1091

E: sjain@sirillp.com

E: tbean@sirillp.com

Steven Sukert (NY Bar # 5690532)

Jeff Ostrow

KOPELOWITZ OSTROW P.A.

One West Las Olas Blvd, Suite 500

Fort Lauderdale, FL 33301

Tel: (954) 525-4100

Fax: (954) 525-4300

E: sukert@kolawyers.com

E: ostrow@kolawyers.com

MURPHY LAW FIRM

A. Brooke Murphy

4116 Will Rogers Pkwy, Suite 700

Oklahoma City, OK 73108

Telephone: (405) 389-4989

E: abm@murphylegalfirm.com

MILBERG COLEMAN BRYSON

PHILLIPS GROSSMAN PLLC

Mark K. Svensson

New York Bar No. 5974290

405 East 50th Street

New York, New York 10022

Tel.: (202) 975-0468

E: msvensson@milberg.com

Proposed Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2026, I electronically filed the foregoing using the Court's CM/ECF system, which will send notifications of such filing to all counsel of record.

/s/ Sonal Jain
Sonal Jain