

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

ZHARIA CHARLES, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

COLOR FACTORY, LLC,

Defendant.

Civil Action No. 1:24-cv-00322-JSR

Hon. Jed S. Rakoff

**NOTICE OF MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES,  
AND SERVICE AWARD**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on November 6, 2024 at 4:00 p.m. before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Plaintiff Zharia Charles ("Plaintiff"), by and through Class Counsel, will move and hereby does move for an order (1) approving the payment of attorneys' fees, costs, and expenses in the amount of one-third of the settlement fund, (2) granting Plaintiff a service award of \$5,000 in recognition of her efforts on behalf of the class, and (3) awarding such other and further relief as the Court deems reasonable and just.

**PLEASE TAKE FURTHER NOTICE** that, in support of the motion, Plaintiff will rely upon the accompanying memorandum of law in support, the Declaration of Zharia Charles, and the Declaration of Philip L. Fraietta, with annexed exhibits.

Dated: August 30, 2024

Respectfully submitted,

By: /s/ Philip L. Fraietta  
Philip L. Fraietta

**BURSOR & FISHER, P.A.**

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*Class Counsel*