

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

<p>PRECISION ASSOCIATES, INC., <i>et al.</i>,</p> <p>Plaintiffs,</p> <p>v.</p> <p>PANALPINA WORLD TRANSPORT (HOLDING) LTD., <i>et al.</i></p> <p>Defendants.</p>	<p>CASE NO. 08-CV-00042 (JG)(PK)</p>
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**NOTICE OF MOTION AND MOTION FOR (1) PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT WITH THE DHL DEFENDANTS; AND (2)
CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS**

PLEASE TAKE NOTICE THAT a hearing on Plaintiffs’ Motion For (1) Preliminary Approval of Proposed Settlement With the DHL Defendants¹; and (2) Conditional Certification Of Settlement Class will be heard before the Honorable John Gleeson, United States District Judge, at the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on a date and time to be designated by the Court.

This motion is based upon this Motion, the Memorandum in Support, the Declaration of W. Joseph Bruckner, and the exhibits thereto, and upon all files, and proceedings herein.

¹ The DHL Defendants are Deutsche Post AG; Danzas Corporation (d/b/a DHL Global Forwarding); DHL Express (USA) Inc.; DHL Global Forwarding Japan K.K.; DHL Japan Inc.; Exel Global Logistics, Inc.; and Air Express International USA, Inc. An executed copy of the Settlement Agreement is attached to the Declaration of W. Joseph Bruckner In Support of Motion For (1) Preliminary Approval of Settlement With The DHL Defendants; and (2) Conditional Certification Of Settlement Class (“Bruckner Decl.”), as Exhibit A.

Dated: December 22, 2015

Respectfully submitted,

s/ W. Joseph Bruckner

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