

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

RICHARD MCCALL and ABRAHAM  
LIBMAN, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

HERCULES CORP.,

Defendant.

Index No. 66810/2021

Mot. Seq. No. 002

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEYS' FEES,  
COSTS, EXPENSES, AND NAMED PLAINTIFFS' ENHANCEMENT AWARDS****TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on July 12, 2022 at 11:00 a.m., as previously scheduled by Order of the Honorable Linda S. Jamieson, J.S.C. (NYSCEF Doc. No. 11), Plaintiff Richard McCall and Abraham Libman ("Plaintiffs"), by and through Class Counsel, will move and hereby do move this Court at the Supreme Court of the State of New York, County of Westchester, 111 Dr. Martin Luther King Jr. Blvd., White Plains, New York, for an Order, pursuant to Article 9 of the CPLR: (1) approving the payment of attorneys' fees, costs, and expenses in the amount of one-third of the settlement fund, (2) granting Plaintiffs enhancement awards of \$5,000 each in recognition of their 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, Plaintiffs will rely upon the accompanying Memorandum of Law in Support, the Affidavit of Richard McCall, dated April 19, 2022, the Affidavit of Abraham Libman, dated April 22, 2022, and the Affirmation of Philip L. Fraietta, Esq., dated May 13, 2022, with annexed exhibits.

Dated: May 13, 2022

Respectfully submitted,

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

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*Class Counsel*