

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

SVETLANA SHOLOPA and MILICA
MILOSEVIC, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

TURK HAVA YOLLARI A.O., INC. (d/b/a
Turkish Airlines, a foreign corporation), and
TURKISH AIRLINES, INC., a New York
Corporation

Defendants.

Case No. 1:20-cv-03294-ALC

Hon. Andrew L. Carter

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that upon: (1) the accompanying Memorandum of Law; (2) the Declaration of Yeremey O. Krivoshey, and the exhibits attached thereto (including the Parties' Class Action Settlement Agreement); Plaintiffs Svetlana Sholopa and Milica Milosevic, by and through their undersigned attorneys, will move this Court, before the Honorable Andrew L. Carter, United States District Court Judge, Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order, pursuant to Federal Rule of Civil Procedure 23(e): (i) granting preliminary approval of the Class Action Settlement; (ii) provisionally certifying the Settlement Class under Federal Rule of Civil Procedure 23(b)(3) in connection with the settlement process; (iii) appointing Bursor & Fisher, P.A. and Liddle Sheets Coulson P.C. as Class Counsel; (iv) appointing Svetlana Sholopa and Milica Milosevic as the Class Representatives for the Settlement Class; and (v) granting such other, further, or different relief as the court deems just and proper. A Proposed Preliminary Approval Order is submitted herewith as Exhibit E to the Settlement.

Dated: December 20, 2022

Respectfully submitted,

By: /s/ Max S. Roberts

Max S. Roberts

BURSOR & FISHER, P.A.

Max S. Roberts
888 Seventh Avenue
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
Email: mroberts@bursor.com

BURSOR & FISHER, P.A.

Yeremey O. Krivoshey (*Pro Hac Vice*)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
Email: ykrivoshey@bursor.com

LIDDLE SHEETS COULSON P.C.

Nicholas A. Coulson (*Pro Hac Vice*)
975 E. Jefferson Avenue
Detroit, Michigan 48207
Telephone: (313) 392-0015
Facsimile: (313) 392-0025
Email: ncoulson@lscounsel.com

Proposed Class Counsel