

**STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 14TH JUDICIAL CIRCUIT  
WHITESIDE COUNTY**

MARY BOWSER, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

HALO BRANDED SOLUTIONS, INC.,

Defendant,

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Civil No. 2024LA18

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

Pursuant to 735 ILCS 5/2-806 (“Section 2-806”), Plaintiff Mary Bowser, along with proposed Class Representatives Jennifer Tanaka and Kei Chibazakura (“Class Representatives”<sup>1</sup>), individually and on behalf of all others similarly situated, hereby move this Court to:

1. Preliminarily approve the Class Action Settlement reached between Class Representatives and Defendant HALO Branded Solutions, Inc. (“HALO” or “Defendant”), as described in the Settlement Agreement between Class Representatives and Defendant (the “Parties”), and the attachments thereto, including the Claim Form, Short Form Notice, the Long Form Notice, and the [Proposed] Order Preliminarily Approving Class Action Settlement, (attached to the Settlement Agreement as Exhibits A through D) as fair, reasonable, and adequate and within the range of possible final approval.

2. Appoint Plaintiff Bowser and proposed Class Representatives Jennifer Tanaka and Kei Chibazakura as the Settlement Class Representatives;

3. Appoint Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman, PLLC, Terence R. Coates of Markovits, Stock & DeMarco, LLC, and M. Anderson Berry of Clayco C. Arnold, APC. as Settlement Class Counsel;

4. Appoint RG2 as the Claims Administrator;

5. Provisionally certify the Settlement Class under 735 ILCS 5/2-801 for settlement purposes only;

6. Approve the Parties’ proposed Notice Program, including the Claim Form, Short Form Notice, and the Long Form Notice, and confirm that it is appropriate notice and that it satisfies due process and 735 ILCS 5/2-803;

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<sup>1</sup> Unless otherwise indicated, the defined terms herein shall have the same definitions as set forth in the Settlement Agreement, attached as Exhibit 1 to the memorandum in support of this motion.

7. Direct Notice to be sent to the Settlement Class Members in the form and manner proposed as set forth in the Settlement Agreement and Exhibits A through C thereto;

8. Set deadlines for Settlement Class Members to submit claims for settlement benefits and to submit requests for exclusion or to object to the Settlement;

9. Set a date for consideration of Settlement Class Counsel's motion for award of fees, costs, and service awards; and

10. Set a date for a Final Fairness Hearing.

This Motion is based upon: (1) this Motion; (2) the Memorandum of Law in Support of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement; (3) the Joint Declaration of Counsel, filed herewith; (4) the Settlement Agreement; (5) the Parties' proposed Notice Program (including the Claim Form, Short Form Notice, and the Long Form Notice); (6) the [Proposed] Order Preliminarily Approving Class Action Settlement; (7) the records, pleadings, and papers filed in this action; and (8) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: January 7, 2025

Respectfully submitted,

/s/ Gary M. Klinger

Gary M. Klinger (IL Bar No. 6303726)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 7, 2025, the foregoing document was filed via the Court's Odyssey's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

*/s/ Gary M. Klinger*

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Gary M. Klinger