

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

CHAIM LERMAN, ROSLYN WILLIAMS,  
and JAMES VORRASI, individually and on  
behalf of others similarly situated,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Hon. Sterling Johnson, Jr.

15-cv-07381 (SJ) (LB)

**MEMORANDUM OF LAW IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

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