

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DONNA ALLISON,  
Individually and as a representative of a  
class of similarly situated persons, on  
behalf of the L BRANDS, INC. 401(K)  
SAVINGS AND RETIREMENT PLAN,

Plaintiff,

v.

L BRANDS, INC., L BRANDS SERVICE  
COMPANY, LLC, THE RETIREMENT PLAN  
COMMITTEE OF THE L BRANDS, INC.  
401(K) SAVINGS AND RETIREMENT PLAN,  
and DOES No. 1–10,  
Whose Names Are Currently Unknown,

Defendants.

Civil Action

No: 2:20-cv-06018-EAS-CMV

August 11, 2022

**PLAINTIFF’S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff, Donna Allison, on behalf of the proposed Settlement Class and the L Brands, Inc. 401(k) Savings and Retirement Plan (the “Plan”), hereby moves (the “Motion”) pursuant to Federal Rule of Civil Procedure 23 and Local Civil Rule 7.1<sup>1</sup> for entry of an Order that: (1) preliminarily approves the Settlement Agreement dated August 11, 2022 with Defendants, L Brands, Inc., L Brands Service Company LLC, and the Retirement Plan Committee of the L Brands, Inc. 401(k) Savings and Retirement Plan;<sup>2</sup> (2) preliminarily certifies the proposed Settlement Class; (3) approves the proposed notice plan (“Notice Plan”) in the Settlement

---

<sup>1</sup> Plaintiff has conferred with Defendants, and Defendants do not oppose the Motion.

<sup>2</sup> The Settlement Agreement and its exhibits are attached to the accompanying Declaration of Alec Berin. Terms not defined herein shall have the same meaning as in the Settlement Agreement.

Agreement and proposed Preliminary Approval Order; and (4) sets a final approval hearing on a date convenient for the Court at least one hundred twenty (120) calendar days after the entry of a preliminary approval order. A proposed Preliminary Approval Order is attached as Exhibit D to the Settlement Agreement.

For the reasons set forth in the Settlement Agreement, accompanying memorandum of law, and all supporting papers, as well as the record in this litigation, Plaintiff respectfully submits that the proposed settlement memorialized in the Settlement Agreement (the “Settlement”) is fair, reasonable, and adequate, and should be preliminarily approved so that notice can be provided to the Settlement Class.

The Settlement is the product of arm’s-length negotiations between the parties and their counsel, all of whom comprehensively litigated this matter, are well-informed regarding all the issues in this litigation, and have significant experience in complex litigation of this type. Accordingly, Plaintiff respectfully requests that the Court enter the proposed Preliminary Approval Order and, if the Court deems necessary, schedule a preliminary approval hearing at its earliest convenience.

Plaintiff stands ready to provide any additional information that the Court may require in connection with its consideration of the Motion.

DATED: August 11, 2022

Respectfully submitted,

/s/ Jeffrey S. Goldenberg  
Jeffrey S. Goldenberg (0063771)  
Todd B. Naylor (0068388)  
GOLDENBERG SCHNEIDER, LPA  
4445 Lake Forest Drive, Suite 490  
Cincinnati, OH 45242  
Telephone: (513) 345-8291  
Facsimile: (513) 345-8294  
Email: [jgoldenberg@gs-legal.com](mailto:jgoldenberg@gs-legal.com)  
[tnaylor@gs-legal.com](mailto:tnaylor@gs-legal.com)

James C. Shah  
Alec J. Berin  
MILLER SHAH LLP  
1845 Walnut Street, Suite 806  
Philadelphia, PA 19103  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: [jcshah@millershah.com](mailto:jcshah@millershah.com)  
[ajberin@millershah.com](mailto:ajberin@millershah.com)

James E. Miller  
Laurie Rubinow  
MILLER SHAH LLP  
65 Main Street  
Chester, CT 06412  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: [jemiller@millershah.com](mailto:jemiller@millershah.com)  
[lrubinow@millershah.com](mailto:lrubinow@millershah.com)

Ronald S. Kravitz  
Kolin C. Tang  
MILLER SHAH LLP  
201 Filbert Street, Suite 201  
San Francisco, CA 94133  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: [rskravitz@millershah.com](mailto:rskravitz@millershah.com)  
[kctang@millershah.com](mailto:kctang@millershah.com)

*Attorneys for Plaintiff, the Plan and the  
Proposed Settlement Class*

**CERTIFICATE OF COMPLIANCE WITH WORD COUNT**

I certify that this Memorandum complies with the page and type requirements under  
Local Rule 7.2(a)(3) because it is less than 20 pages double-spaced.

/s/ Jeffrey S. Goldenberg  
Jeffrey S. Goldenberg

**CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2022, I electronically filed the foregoing Plaintiffs' Motion for Preliminary Approval of Class Action Settlement with the Clerk of Court, and upon the counsel of record using the CM/ECF system.

/s/ Jeffrey S. Goldenberg  
Jeffrey S. Goldenberg