

Docket in case # 13 CV/ER 3073

As: Letter

Date: 12/20/2017

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December 20, 2017

**VIA FAX**

The Honorable Nelson S. Román  
The Hon. Charles L. Briant Jr. United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: *Goldemberg et al., v. Johnson & Johnson Consumer Companies, Inc.*,  
No. 13-cv-03073-NRS-LMS

Dear Judge Román:

We are Class Counsel in the above matter. On December 11, 2017 we submitted a letter to the Court via fax pursuant to your Individual Practices requesting a pre-motion conference seeking leave to move for an appeal bond (the "Appeal Bond Letter") from Objectors Pamela Sweeney and Ashley Hammack (the "Objectors"). That same day, we served the Appeal Bond Letter on Ms. Hammack's counsel, Stephen D. Field, via e-mail, and on Ms. Sweeney, who is proceeding *pro se*, via both e-mail and UPS Next Day Air Delivery. Pursuant to your Individual Rules Rule 3.A.ii., the Objectors' oppositions were due on December 18, 2017. The Objectors have failed to file or serve any opposition to Plaintiffs' Appeal Bond Letter.

There being no response to their request for an appeal bond, Plaintiffs respectfully request that this Court issue an Order requiring each of the Objectors to post an appeal bond for \$45,000. *See Tardibuono-Quigley v. HSBC Mortgage Corp. (USA)*, No. 15-6940 (S.D.N.Y. Sept. 26, 2017), ECF No. 91 (granting motion after defendant failed to respond to plaintiff's pre-motion conference letter requesting leave to file motion).

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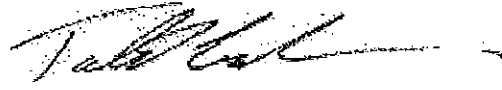
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Respectfully submitted,



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Todd S. Garber

cc: Counsel of Record by email & *pro se* Objector by UPS