

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KAFELE WALKER, on behalf of himself and  
on behalf of all other similarly-situated persons,

Plaintiff,

v.

VLC NOLITA LLC, VLC UNION SQUARE LLC,  
VLC UPPER WEST LLC, VLC WEST VILLAGE  
LLC, ANDRES MIER Y TERAN, ALFRED MIER  
Y TERAN and CARLOS MIER Y TERAN,

Defendants.  
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Civil Action No. 12 Civ. 3712 (RJS)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that pursuant to 29 U.S.C. §216(b), Plaintiff Kafele Walker will move this Court, at the United States Courthouse located at 500 Pearl Street, New York, New York 10007, before the Honorable Richard J. Sullivan, on a date and at a time to be designated by the Court for an Order: (1) granting conditional certification of all former and current Crepe Makers who were employed by the Corporate Defendants in New York, New York since May 9, 2009; (2) authorizing Plaintiff to send notice of this action and a consent form to all applicable Crepe Makers; (3) directing Defendants to provide Plaintiff with the contact information of all applicable Crepe Makers; and (4) awarding Plaintiff such other and further relief that the Court deems just and proper including, but not limited to, reasonable attorneys' fees and costs.

Oral argument will be on a date and at a time designated by the Court.

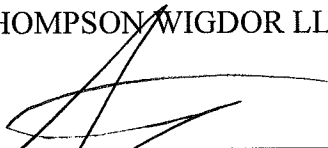
Plaintiff's Memorandum of Law in Support of His Motion for Conditional Certification and Authorization To Send Notice Of This Action, the Declaration of Kafele Walker, and the Declaration of Shaffin A. Dato and the exhibits attached thereto, are submitted herewith.

Dated: November 13, 2012  
New York, New York

Respectfully submitted,

THOMPSON WIGDOR LLP

By:



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Kenneth P. Thompson  
Shaffin A. Dato  
Tanvir H. Rahman

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