

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<i>IN RE</i> NYC BUS TOUR ANTITRUST LITIGATION	Master Case File No. 13-CV-0711 (ALC)(GWG) <b>RELATED TO ALL CASES</b>  ECF Case  <b>JURY TRIAL DEMANDED</b>
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**NOTICE OF MOTION**  
**FOR CLASS CERTIFICATION**

PLEASE TAKE NOTICE that Plaintiff Natasha Bhandari, through her undersigned attorneys, will move this Court before the Honorable Andrew L. Carter, Jr., at the Courthouse located at 500 Pearl Street, Courtroom 14A, New York, New York 10007, at a time and date to be set by the Court, for the following:

1. Certification of this action as a class action pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(2), and (b)(3);
2. Certification of the following class: all persons who, or entities that, directly purchased “hop-on, hop-off” bus tours in New York City from Twin America under the Gray Line brand from April 1, 2009, and under the CitySights brand from June 1, 2009, until the effects of defendants’ anticompetitive conduct cease. Excluded from the Class are defendants, their present and former parents, subsidiaries, affiliates, and employees;
3. Appointment of Natasha Bhandari and Tracey Nobel as the Class Representatives;
4. Appointment of Bhandari and Nobel’s counsel of record as Class Counsel.

In support of this Motion, Plaintiff relies on this Notice of Motion, the accompanying Plaintiff's Motion for Class Certification, the Declaration of William Christopher Carmody, the Declaration of Dr. Hal J. Singer, the Declaration of Alan Vasquez, the Declaration of Tracy Nobel, the Declaration of Natasha Bhandari, and the Declaration of Jordan Connors, and the attached exhibits.

Dated: October 22, 2013

Respectfully submitted,

/s/ Drew D. Hansen

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