

On January 10, 2022, at 1:00 p.m., before the Honorable James C. Dever III, Plaintiffs Sarah Conte, Joanne Touchberry, Tekisha L. Nicholson, Toby Beliveau, Alexander Carlisle and Earlene N. Hunter (“Plaintiffs”) will and hereby do move this Court pursuant to Federal Rule of Civil Procedure 23 for orders granting final approval of the proposed settlement of the above-captioned class action and approval of the proposed plan for allocating the settlement proceeds. Lead Counsel will also move this Court for an order awarding the requested attorneys’ fees and expenses and service awards for Plaintiffs.

This motion is based on the supporting memorandum, the Declaration of Evan J. Kaufman in Support of Final Approval of Class Action Settlement, Approval of Plan of Allocation, and an Award of Attorneys’ Fees, Expenses, and Service Awards, the Declarations of Plaintiffs, the Declarations of Plaintiffs’ Counsel, the papers and filings on record in this matter, and such additional evidence or argument as may be presented at the hearing.

Proposed orders will be submitted with Plaintiffs’ reply submission after the deadline for requesting exclusion and objecting has passed.

DATED: December 1, 2021

Respectfully submitted,

/s/ Brian L. Kinsley

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