

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**VON KING, DANIELLE JOHNSON,
CHELSEA SHAW, JOY FLOWERS,
SUSAN KOLYNO, JACQUELINE
PERKINS, ARTHUR WILLIAMS,
and JANE/JOHN DOE 1-9, on behalf
of themselves and all others similarly
situated,**

Plaintiffs,

v.

**STATE OF GEORGIA, GEORGIA
DEPARTMENT OF LABOR, and
COMMISSIONER MARK BUTLER,
in his official capacity,**

Defendants.

**CIVIL ACTION FILE NO.
1:21-CV-03082-JPB**

(CLASS ACTION)

**JOINT REQUEST TO
CLARIFY NOTICE PLAN AND PROCEED WITH SETTLEMENT**

After the Court preliminarily approved the Class Settlement in this case [Doc. 45], a dispute arose regarding the Parties' communication about the proposed Settlement. Defendants filed an emergency motion to withdraw their consent to the preliminary approval [Doc. 46], and Plaintiffs responded [Doc. 47].

The Parties now jointly move the Court to clarify the Notice Plan so that the

Settlement process can proceed without further dispute, and show the Court as follows.

Clarified Notice Plan

1. The Defendants withdraw their Emergency Motion to Withdraw Consent.
2. In addition to the Notice provisions already included in the Court's Preliminary Approval order, the Defendants and Class Counsel will issue the joint press release, attached hereto as Exhibit A. This will satisfy the joint press release requirement in the Preliminary Approval order.
3. Notice communications regarding the Settlement shall include the language in Exhibit B.
4. The parties request that the following deadlines in the Court's Preliminary Approval Order be amended as follows, or in such other way as the Court directs, and that the Court order that these updated deadlines be included in the Notice Materials:
 - a. Objections: no later than September 19, 2022
 - b. Supporting materials for Objections: October 17, 2022
 - c. Final Approval: the week of October 24, 2022.
5. The Parties agree that when they seek a Final Order from the Court, they will seek an order that contains the language in Exhibit B.

6. Twelve months from the date of the filing of this motion, counsel for both parties agree to provide a courtesy copy to the other party at least twenty-four (24) hours in advance of issuing any unilateral press release or official written communication to the press related to this class action suit. This provision shall also apply to social media posts and other written public communications issued by the Parties regarding the lawsuit and notice provisions, including those required by the Preliminary Approval Order.
- Respectfully submitted this 17th day of August, 2022.

/s/ Jason J. Carter _____

Jason J. Carter

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2022, I caused a copy of the foregoing **JOINT REQUEST TO CLARIFY NOTICE PLAN AND PROCEED WITH SETTLEMENT** to be served upon all counsel via the court's CM/ECF system.

/s/ Jason J. Carter _____
Jason J. Carter
Ga. Bar No. 141669