

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION**

NORCAL TEA PARTY PATRIOTS, et al.,)	
ON BEHALF OF THEMSELVES,)	
THEIR MEMBERS, and THE CLASS)	
THEY REPRESENT,)	
)	Case No. 1:13-cv-00341
Plaintiffs,)	
)	
v.)	
)	Judge Michael R. Barrett
THE INTERNAL REVENUE SERVICE, et al.,)	
)	
Defendants.)	
_____)	

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs NorCal Tea Party Patriots, South Dakota Citizens for Liberty, Inc., Americans Against Oppressive Laws, Inc., Texas Patriots Tea Party, and San Angelo Tea Party (collectively, "Plaintiffs") hereby move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order:

1. Granting preliminary approval of the proposed Settlement as set forth in the Settlement Agreement;
2. Staying all proceedings in this Action except to the extent necessary to administer and evaluate the Settlement and to receive briefing and resolve the pending Motions to Seal by Former Individual Defendants Lois Lerner and Holly Paz;
3. Directing that notice be given to Class Members in the proposed forms and methods set forth in the Settlement Agreement;
4. Setting deadlines and procedures for filings, class notice to issue, and class members to exclude themselves, object, or comment on the proposed Settlement;

5. Appointing KCC, LLC, as the settlement administrator for purposes of disseminating the class notice, processing class member claims; processing requests for exclusion, comments, or objections; and issuing payments required by the Settlement; and
6. Setting a final approval hearing on or after ninety (90) days from the date of preliminary approval to determine whether the settlement should be granted final approval and whether to grant incentive awards and awards of attorneys' fees and expenses.

In support of their Motion, Plaintiffs incorporate by reference their Suggestions in Support of Motion for Preliminary Approval, filed contemporaneously with this Motion. Plaintiffs will also submit a proposed order for the Court's consideration.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion for Preliminary Approval of Class Action Settlement, including all requested relief with respect to the proposed settlement of this class action, and also grant them any other such relief as the Court deems appropriate.

Dated: March 13, 2018

Respectfully submitted,

GRAVES GARRETT, LLC

/s/ Edward D. Greim

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Class Counsel

Certificate of Service

The undersigned attorney hereby certifies that, on March 13, 2018, the foregoing document was served the Court's CM/ECF electronic notification system to all counsel of record.

/s/ Edward D. Greim
Attorney for Plaintiffs