

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Charles Kendricks, on behalf of himself and Class
Members,

Plaintiff,

v.

LaToya Hughes & Charles Truitt,

Defendants.

Case No. 13-cv-1068

Honorable Andrea R. Wood

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

Pursuant to Federal Rule of Civil Procedure 23(e), Named Plaintiff, Charles Kendrick individually and on behalf of the Settlement Class, by and through their undersigned counsel, respectfully move this Court to preliminarily approve the proposed class action settlement. For the reasons set forth in Plaintiffs' accompanying memorandum of points and authorities, the Court should grant the motion and enter the attached Preliminary Approval Order which:

1. Preliminarily approves the Proposed Settlement Agreement;
2. Appoints the Named Plaintiff as class representative for the Settlement Classes and Heather Lewis Donnell of Loevy & Loevy as Class Counsel;
3. Requires that notice be sent to the Settlement Class as provided in the Notice Plan; and
4. Schedules a hearing on final approval of this Agreement (the "Final Approval Hearing") on or after January 17, 2025, to consider the fairness, reasonableness, and adequacy of the proposed settlement and whether it should be finally approved by the Court, as well as to determine the Attorneys' Fee Award and Incentive Awards.

A copy of the Settlement Agreement is attached to Plaintiffs' memorandum in support of this motion as Exhibit 8. The attachment includes the following additional documents, which are exhibits to the Settlement Agreement:

<u>Exhibit</u>	<u>Description</u>
A	Class Notice of Settlement
B	Proposed Order Preliminarily Approving Settlement
C	Proposed Order Approving Final Settlement

WHEREFORE, the Plaintiffs request that the Court grant their motion and enter the Preliminary Approval Order.

Janaury 17, 2025

Respectfully submitted,

/s/ Heather Lewis Donnell

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