

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Julie Dalton, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

Home Depot U.S.A. d/b/a Home Depot,

Defendant.

Civil Case No.: 23-cv-02126(DWF/DLM)

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL AND  
TO DIRECT NOTICE OF PROPOSED SETTLEMENT TO THE CLASS**

Plaintiff Julie Dalton, on behalf of herself and all others similarly situated, hereby moves, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for entry of an order certifying a class for settlement purposes, preliminarily approving the proposed class-action settlement, appointing plaintiff class representative for purposes of settlement, appointing plaintiff’s counsel as class counsel for purposes of settlement, directing notice of the proposed class-action settlement in the above-captioned litigation, scheduling a hearing to consider final approval of the settlement, and setting a schedule for any associated briefing, application for service awards or attorney’s fees and objections. Defendant does not oppose this motion. In support of this motion, Plaintiff submits a Memorandum of Law, Declaration of Patrick W. Michenfelder, Esq. and Settlement Agreement attached thereto. For the reasons set forth in her Memorandum of Law and

accompanying papers, Plaintiff respectfully requests that the Court enter the proposed order submitted herewith.

Dated: August 13, 2025

**THRONDSET MICHENFELDER, LLC**

*/s/ Patrick W. Michenfelder* \_\_\_\_\_

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