



juncture with regard to a report to the Court of any possible objections from Class Members to the proposed Class Action Settlement.

4. Thus, Class Counsel is filing this Motion for Final Approval of the Class Action Settlement (without labeling it an unopposed motion) at this time in the interest of the Class Members and in order to be compliant with the Court's Second Amended Preliminary Approval Order that Class Counsel file the Motion before the April 16, 2025 deadline.
5. Additionally, Amy Lechner, the program manager for the Settlement Administrator Simpluris, has prepared an initial Declaration attached as an exhibit to the Memorandum in Support of the Motion for Final Approval of Class Action Settlement. Class Counsel anticipates filing an updated Declaration of Amy Lechner at the end of the Notice period on May 2, 2025, and before the May 7, 2025 final hearing date to provide the Court with full reporting of the administrative work of Simpluris and the final numbers related to Claim Forms submitted and possible objections and/or opt-out forms filed by Class Members.
6. Therefore, Class Counsel requests this Court enter an Order granting:
  - a. Final approval of the proposed Settlement Agreement (Dkt. 234-1);
  - b. Final approval of the Plan of Allocation (Dkt. 236);
  - c. Final approval of Class Counsel's application for attorneys' fees, reimbursement of expenses and payment of administrative costs (Dkt. 247);
  - d. Final approval of the requested Service Award to the Class Representative (Dkt. 247);
  - e. Final approval and establishment of the Settlement Fund under the Settlement Agreement as a qualified settlement fund ("QSF") pursuant to Internal Revenue Code Section Treas. Reg. § 1.468B-1, and the Treasury Regulations promulgated thereunder;
  - f. Entry of a final judgment and a dismissal order of this action against the Board and DLF with prejudice after the settlement has been funded by the Defendants within 30 days after the Effective Date, as further defined in the Settlement Agreement; and

g. Any other relief this Court deems equitable and just.

Respectfully Submitted,

**KAYA HUDGINS**

By: /s/ John W. Mauck

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on March 21, 2025, I caused the foregoing Plaintiff's **MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** served electronically through the Northern District of Illinois CM/ECF electronic filing on all counsel of record, including:

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