



upon after several years of intense litigation and arm's-length negotiations with the assistance of a highly respected mediator.

The Settlement Agreement is fair, reasonable, adequate, and likely to warrant final approval under the Eleventh Circuit's long standing class settlement fairness factors as well as the requirements of Fed. R. Civ. P. 23(e). Moreover, the Settlement Class satisfies and is certifiable under Fed. R. Civ. P. 23(a) and (b)(1). The Plan of Distribution of settlement proceeds and Notice should be approved because it is fair, adequate, and reasonable. No objections warrant disapproval of the Settlement.

In support of this Motion, the Class Representatives submit herewith their Memorandum of Law in Support of Unopposed Motion for Final Approval of Class Action Settlement, along with accompanying exhibits.

After the Court conducts its Final Approval Hearing on April 18, 2024, for these reasons, as well as those set forth in the supporting materials submitted herewith, the Class Representatives respectfully request that the Court finally approve the Settlement pursuant to Federal Rule of Civil Procedure 23(e) and enter the proposed Final Judgment (Doc. 121-1 at pp. 68 – 76).

RESPECTFULLY SUBMITTED,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2024, the above and foregoing document was filed and served via the Court's CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

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