IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

JESSICA JONES, et al., Plaintiffs, v. **VARSITY BRANDS, LLC, et al.** Defendants.	Case No. 2:20-cv-02892-SHL-tmp

PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

NOTICE OF MOTION

Pursuant to Fed. R. Civ. P. 23, Plaintiffs Jessica Jones, Christina Lorenzen, and Amy Coulson hereby move the Court for an order:

1. Granting preliminary approval of the proposed Settlement between Plaintiffs and Defendants, and preliminarily finding pursuant to Fed. R. Civ. P. 23(c)(2) and 23(e) that the terms of the proposed Settlement, as encompassed by the Settlement Agreement filed herewith, are fair, reasonable, and adequate as to the absent members of the proposed State Law Damages Class and Injunctive Relief Class ("Settlement Classes");

2. Finding that the Court will likely be able to certify the proposed Settlement Classes as defined in the Settlement Agreement pursuant to Fed. R. Civ. P. 23 (a) and (b);

3. Approving Plaintiffs as representatives of the Settlement Classes;

4. Approving (a) Joseph Saveri Law Firm, LLP, as Plaintiffs' lead class counsel; (b) Paul LLP, Hartley LLP, and Gustafson Gluek PLLC as Plaintiffs' executive committee counsel; and (c) Turner Feild, PLLC as Plaintiffs' liaison counsel; finding that all will fairly and adequately protect the interests of the Settlement Classes; and collectively approving all of the above counsel as Settlement Class Counsel pursuant to Fed. R. Civ. P. 23(c)(1)(B) and (g);

5. Appointing Angeion Group LLC as Settlement Administrator;

6. Appointing Citibank N.A. as Escrow Agent;

7. Approving Plaintiffs' proposed Notice Plan and authorizing dissemination of notice to the proposed Settlement Classes pursuant to Fed. R. Civ. P. 23(c)(2);

8. Setting a date for the Final Settlement Fairness Hearing and authorizing Plaintiffs' proposed schedule for completing the approval process.

WHEREFORE, for the reasons set forth in the accompanying memorandum of law and exhibits, together with all documents entered in the Court's docket and transcripts of proceedings in this matter, and any oral argument that shall be taken, Plaintiffs respectfully request that the Court grant this motion and enter the Proposed Order filed herewith. Defendants do not oppose this motion.

Dated: May 13, 2024

Respectfully submitted,

By: */s/ Joseph R. Saveri*
Joseph R. Saveri

Joseph R. Saveri*
Ronnie Seidel Spiegel*+
David Seidel*
Kevin E. Rayhill*
Elissa A. Buchanan*
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1505
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com
rspiegel@saverilawfirm.com
dseidel@saverilawfirm.com
krayhill@saverilawfirm.com
eabuchanan@saverilawfirm.com

Van Turner Jr. (TN Bar No. 22603)
TURNER FEILD, PLLC
2650 Thousand Oaks Blvd., Suite 2325
Memphis, Tennessee 38118
Telephone: (901) 290-6610
Facsimile: (901) 290-6611
VTurner@TurnerFeildLaw.com

Richard M. Paul III*
Ashlea Schwarz*
PAUL LLP
601 Walnut, Suite 300
Kansas City, Missouri 64106
Telephone: (816) 984-8100
rick@paulllp.com
ashlea@paulllp.com

Jason S. Hartley*
HARTLEY LLP
101 West Broadway, Suite 820
San Diego, CA 92101
Telephone: (619) 400-5822
hartley@hartleyllp.com

Daniel E. Gustafson*
Daniel C. Hedlund*
Daniel J. Nordin*
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dnordin@gustafsongluek.com

* Admitted *pro hac vice*

+Located in Washington State

Attorneys for Individual and Representative Plaintiffs

CERTIFICATE OF CONSULTATION

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that my firm consulted with Defendants' counsel via email regarding this motion. No party opposed the relief sought.

/s/ Joseph R. Saveri

Joseph R. Saveri