

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

JILL HODAPP, et al., individually and on
behalf of all those similarly situated,

Plaintiff,

v.

REGIONS BANK,

Defendant.

No.: 4:18-cv-01389-HEA

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF THE
COLLECTIVE AND CLASS ACTION SETTLEMENT, PROVISIONAL
CERTIFICATION OF THE RULE 23 CLASSES, PRELIMINARY APPROVAL OF THE
REQUESTS FOR ATTORNEY'S FEES AND COSTS, SERVICE AWARDS, AND
SETTLEMENT ADMINISTRATION FEES, AND APPOINTMENT OF CLASS
COUNSEL AND SETTLEMENT ADMINISTRATOR**

Named Plaintiffs Jill Hodapp, Heather Fisk, Paige Green, Tracey Clampitt, Pamela Turner, Jonathan Haggard, Matthew Gold, Jessica Wilson, Leigha Baxley, Elias Baker, and Jocelyn Boultt ("Named Plaintiffs") respectfully move this Court for an Order:

1. Provisionally certifying Named Plaintiffs' proposed Fed. R. Civ. P. 23 classes alleging claims under Missouri, Arkansas, Indiana, and Illinois wage-and-hour laws;
2. Granting preliminary approval of the Parties' Settlement with respect to the proposed Fed. R. Civ. P. 23 classes alleging claims under Missouri, Arkansas, Indiana, and Illinois wage-and-hour laws;
3. Granting preliminary approval of the Parties' Settlement with respect to the FLSA collective action;
4. Appointing Swartz Swidler, LLC as counsel for the Putative Class Members;

5. Approving Settlement Services, Inc. as Settlement Administrator and preliminarily approving Settlement Services, Inc.'s fees not to exceed \$95,000.00;
6. Approving the proposed Settlement Notices and notice procedures;
7. Preliminarily approving Named Plaintiffs' counsel's requested fees of 1/3 of the Settlement Fund and reimbursement of out-of-pocket costs not to exceed \$115,000.00;
8. Preliminarily approving Named Plaintiffs' requested Service Awards, totaling \$72,500.00;
9. Directing the Parties to file any timely submitted and properly completed objections with the Court no later than seven (7) days after the close of the Opt-Out Deadline;
10. Directing the Parties to file with the Court any written responses to any filed objections no later than fourteen (14) days after the close of the Opt-Out Deadline;
11. Directing the Parties to file a motion for final approval of the Settlement no later than fourteen (14) days after the close of the Opt-Out Deadline; and
12. Scheduling a Final Approval hearing at least 75 days after the Court's grant of the instant Motion.

Defendant Regions Bank ("Defendant") does not oppose the instant motion.

Dated: February 18, 2022

Respectfully Submitted,

/s/ Matthew D. Miller

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CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2022 a copy of the foregoing Motion and supporting documents was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Matthew Miller
Matthew D. Miller, Esq.