

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|------------------------|---|---------------------------|
| LORI COWEN et al., |) | |
| |) | |
| Plaintiffs, |) | Case No.: 1:17-cv-01530 |
| v. |) | |
| |) | Judge Robert W. Gettleman |
| LENNY & LARRY’S, INC., |) | |
| |) | Magistrate Young B. Kim |
| Defendant. |) | |
| |) | |
| |) | |
| |) | |

**JOINT MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Plaintiffs Lori Cowen, Rochelle Ibarrola, Ava Adames, Amanda Wells and Barbara Whalen (collectively referred to herein as “Plaintiffs”), by and through their undersigned counsel, and Defendant, Lenny & Larry’s, Inc. (converted to and now known as Lenny and Larry’s, LLC) (“Lenny & Larry’s” or “Defendant”), through its undersigned counsel, respectfully move this Court to grant preliminary approval to the class action settlement agreement (the “Settlement Agreement”) between Plaintiffs and Defendant, a copy of which is attached to the accompanying Memorandum in Support of Preliminary Approval of Class Action Settlement as **Appendix 1**, and to approve the proposed class notice plan.

WHEREFORE, for the reasons stated in the accompanying Memorandum in Support of Preliminary Approval of Class Action Settlement, Plaintiffs and Defendant respectfully request that this Court enter a Preliminary Approval Order in the form of Exhibit B to the Settlement Agreement, which:

- (i) Grants preliminary approval of the Settlement Agreement;

- (ii) Directs Class Settlement Notice as described in Exhibit B to the Settlement Agreement subject to any modification deemed necessary by the Court;
- (iii) Appoints Plaintiffs' Counsel as Class Counsel;
- (iv) Sets dates for submission of claim forms, opt outs, and objections; and
- (v) Schedules a Final Approval Hearing of the class settlement.

Dated: October 25, 2018

Respectfully,

/s/ Edward A. Wallace

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Counsel for Plaintiffs and the Settlement Class

Dated: October 25, 2018

Respectfully,

/s/ Kimberly L. Buffington

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Counsel for Defendant Lenny & Larry's, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed using this Court's CM/ECF service, which will send notification of such filing to all counsel of record on this 25th day of October 2018.

/s/ Edward A. Wallace
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