

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)**

TIFFANY JOHNSON,	*	
Plaintiff,	*	
v.	*	Civil Action No. 8:22-cv-02001-PX
	*	(lead)
CONTINENTAL FINANCE COMPANY,	*	
LLC, et al.,	*	
Defendants.	*	
	*	
TRACEY CRIDER,	*	
Plaintiff,	*	
v.	*	Civil Action No. 8:23-cv-00854-PX
	*	(member)
CONTINENTAL FINANCE COMPANY,	*	
LLC, et al.,	*	
Defendants.	*	
	*	

* * * * *

**Joint Motion for Preliminary Approval of
Class Action Settlement, and for Approval of the
Form, Manner and Administration of Notice**

Plaintiffs, Tiffany Johnson and Tracey Crider (“Representative Plaintiffs”), and Defendants Continental Finance Company, LLC and Continental Purchasing, LLC (“Continental”), jointly and respectfully move for preliminary approval of a proposed class action settlement pursuant to Fed. R. Civ. P. 23(e)(1).

The Settlement Agreement (“Agreement”) is attached as **Exhibit A**. The proposed notices for class members about the settlement are attached to the Agreement as **Exhibit 2** (Postcard Notice), **Exhibit 3** (Email Notice) and **Exhibit 4** (Long-Form Notice).

As more fully set forth in the Representative Plaintiffs’ attached memorandum of law, notice to class members about the proposed settlement is warranted, because the

Court “will likely be able to: (i) approve the proposal under Rule 23(e)(2); and (ii) certify the class for purposes of judgment on the proposal.” Fed. R. Civ. P. 23(e)(1).

As reflected in the attached proposed Order Preliminarily Approving Settlement, Certifying Class for Settlement Purposes, Appointing Class Counsel and Settlement Administrator, and Setting Schedule with Respect to Notice, Settlement Hearing and Administration (the “Order”), which is attached to the Agreement as **Exhibit 1**, the parties propose the following timetable:

Within fifteen (15) calendar days after Entry of the Order	Continental to provide Settlement Administrator and Class Counsel the necessary and agreed upon data to compile the Settlement Class Member List
Within five (5) calendar days after entry of the Order	Continental to deposit \$5.75 million into the Common Fund at Bank designated by Class Counsel and the Settlement Administrator
Within thirty (30) calendar days after entry of the Order	Settlement Administrator to send out notice to Class and publish Settlement Website
At Least Thirty calendar (30) days before the Final Approval hearing	Representative Plaintiffs to file memoranda in support of the settlement, an award of attorneys’ fees and costs and an incentive payment to the Representative Plaintiff
Forty-Five (45) calendar days from the Notice Date	Deadline for any member of the Class to mail Request for Exclusion or file and serve any objection to the settlement
As set by the Court, but after one hundred (100) calendar days after entry of the Order	Final Approval hearing

WHEREFORE, the parties jointly and respectfully request that the Court (1) preliminarily approve the proposed settlement, (2) preliminarily certify the Class for settlement purposes only, (3) appoint the undersigned attorneys for Representative Plaintiff as Class Counsel, (4) approve the form of and direct notice to the Class, and (5)

grant such further relief as justice demands. A comprehensive proposed Order is attached.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE
LLP

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