

**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,<br>LLC, <i>et al.</i> , | * |                                   |
| Defendants.  | * |                                   |
|  | * |                                   |
| TRACEY CRIDER,                                       | * |                                   |
| Plaintiff,   | * |                                   |
| v.   | * | Civil Action No. 8:23-cv-00854-PX |
|  | * | (member)                          |
| CONTINENTAL FINANCE COMPANY,<br>LLC, <i>et al.</i> , | * |                                   |
| Defendants.  | * |                                   |
|  | * |                                   |

\* \* \* \* \*

**Motion for Final Approval  
of Class Action Settlement**

Representative Plaintiffs Tiffany Johnson and Tracey Crider (“Representative Plaintiffs”), acting individually and on behalf of a Settlement Class of similarly situated persons, respectfully moves for final Court approval of the class-wide settlement which the Court preliminarily approved in this case pursuant to Fed. R. Civ. P. 23(e)(1) on December 9, 2025. *See* ECF No. 76, Preliminary Approval Order. The Preliminary Approval Order granted preliminary certification of a settlement class defined as follows:

All Maryland residents with credit card accounts for credit cards issued by the Bank of Missouri or Celtic Bank and serviced by Continental on or after March 2014, where the borrower made one or more payments on the loan (each, a “Class Member” and each such account, an “Account[”]).

ECF No. 76 at ¶3; ECF No, 73-2, Settlement Agreement ¶ 17(a) (the “Settlement Class”).

Excluded from the class are all employees or representatives of Continental, and all

Court personnel. *Id.*

Now, pursuant to Fed. R. Civ. P. 23(e)(2) and in advance of the final fairness hearing scheduled for March 30, 2026, Representative Plaintiffs submit this motion in support of final approval of the Settlement Agreement (ECF No. 73-2), as the proposed settlement is fair, adequate and reasonable to Settlement Class Members, and the class certification requirements of Fed. R. Civ. P. 23 are satisfied. Further grounds and authorities for this motion are in the accompanying memorandum of law and exhibits, which are incorporated.

WHEREFORE, Representative Plaintiffs respectfully request that the Court grant final approval to the Settlement Agreement and enter the attached, comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.<sup>1</sup>

Respectfully submitted,

/s/ Benjamin H. Carney  
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**Attorneys for Representative Plaintiffs and  
the Settlement Class**

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<sup>1</sup> The proposed Final Order Approving Settlement and Certifying Settlement Class (“Final Approval Order”) is comprehensive and resolves all motions filed today: this Motion, the Motion for Incentive Award, the Motion for *Cy Pres* Award, and the Motion for Award of Attorney’ Fees and Expenses to Class Counsel. The same proposed Final Order will be filed with each of these motions, pursuant to the requirement that a proposed Order be submitted with every motion.