

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

SIQBHAN MORROW and TRACEE LE
FLORE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

NAVY FEDERAL CREDIT UNION,

Defendant.

Case No. 1:21-cv-722-MSN-LRV

MARIA HART and TRACEE LE FLORE,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

NAVY FEDERAL CREDIT UNION,

Defendant.

Case No. 1:22-cv-844-MSN- LRV

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND APPLICATION FOR
ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS**

Plaintiffs and Class Counsel submit this Unopposed Motion for Final Approval of Class Action Settlement and Application for Attorneys' Fees, Costs, and Service Awards. For the reasons explained in the Memorandum in Support of Unopposed Motion for Final Approval of Class Action Settlement and Application for Attorneys' Fees, Costs, and Service Awards ("Memorandum") filed contemporaneously herewith, Plaintiffs request the Court to enter the [Proposed] Final Approval Order and Final Judgment, attached as *Exhibit D* to the Memorandum,

to: (1) grant Final Approval to the Settlement, finding it to be fair, adequate, and reasonable; (2) award Class Counsel the requested \$2,000,000.00 Attorneys' Fees and Costs Payment; (3) award the Class Representatives the requested \$5,000.00 Service Awards; (4) finally certify the Settlement Class for settlement purposes only; (5) determine the completed Notice Program satisfies Due Process requirements; (6) bar and enjoin all Releasing Parties from asserting any of the Released Claims at any time and in any jurisdiction during any appeal from the Final Approval Order and Final Judgment; (7) release the Released Parties from the Released Claims; and (8) reserve the Court's continuing and exclusive jurisdiction over the Parties, all Settlement Class Members, and all objectors for the purposes of administering, supervising, construing, and enforcing the Agreement.

Dated: June 9, 2024

Respectfully submitted,

/s/ Heather Whitaker Goldstein

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**Admitted *pro hac vice* in No. 21-CV-722
and No. 22-CV-844.
***Application for admission *pro hac vice*
Forthcoming

CERTIFICATE OF SERVICE

I hereby certify that on this the 9th day of June, 2024, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system.

/s/ Heather Whitaker Goldstein