

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

BRIAN RICHARDSON, *et al.*, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

VERDE ENERGY USA, INC.,

Defendant.

No.: 5:15-cv-06325-WB

**PLAINTIFFS’ MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to FED. R. CIV. P. 23, Plaintiffs Brian Richardson, Michelle Hunt, Jacqueline Bowser, Kris Villiger, and Donna Schley (“Plaintiffs”) respectfully move this Court for entry of an Order granting final approval of the Parties’ Settlement Agreement<sup>1</sup> as fair, reasonable, and adequate for the Settlement Class. In support of this Motion, Plaintiffs rely on the accompanying Memorandum of Law, the Declaration of Lane L. Vines, the Declaration of Andy Morrison on behalf of the Settlement Administrator, all other documents filed in support of approval of the Settlement, and all other proceedings in this Action.

Accordingly, Plaintiffs respectfully request that this Motion be granted and that the Court enter the Parties’ accompanying proposed Final Approval Order and Final Judgment.

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<sup>1</sup> Capitalized terms not otherwise defined have the meaning set forth in the Parties’ Amended Stipulation and Agreement of Settlement dated December 19, 2019 (the “Settlement Agreement” or “Settlement”) filed previously with the Court. *See* Dkt. 134-1.

Dated May 6, 2020

Respectfully submitted,

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*Attorneys for Plaintiffs and the  
Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 6, 2020, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Lane L. Vines

Lane L Vines