

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

MARK WILLIAM THOMAS, *et al.*,

Plaintiffs,

v.

Civil No. 3:18-cv-00684-MHL

EQUIFAX INFORMATION SERVICES, LLC,

Defendant.

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT, CONDITIONALLY CERTIFYING CLASS FOR
PURPOSE OF SETTLEMENT, APPOINTING CLASS COUNSEL, DIRECTING
NOTICE TO THE CLASS, AND SCHEDULING FINAL FAIRNESS HEARING**

Plaintiffs, Mark William Thomas, Bertram M. Brown, C. Ralph Copeland, Jr., on behalf of themselves and all others similarly situated (the "Settlement Class"), with the consent of Defendant, Equifax Information Services, LLC ("Defendant" or "Equifax") entered into a Stipulation and Agreement of Settlement (the "Settlement Agreement") attached hereto as Exhibit 2. Pursuant to Fed. R. Civ. P. 23, the parties hereby file this Motion in support of their request for Preliminary Approval of the Class Action Settlement Agreement. For the reasons supplied in the accompanying Memorandum, the Parties respectfully request that the Court enter a Preliminary Approval Order (1) preliminarily approving the class action settlement, (2) scheduling a final fairness hearing, (3) certifying the proposed Settlement Class for purposes of the proposed class settlement, and (4) appointing Class Counsel and (5) approving the notice plan as set forth in paragraph VII. of the Settlement Agreement.

Respectfully submitted,

By: /s/ Leonard A. Bennett
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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of April 2019, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record:

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