UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO

DEREK ROTONDO, on behalf of himself and all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE Bank, N.A.,

Defendant.

No. 19-cv-02328

District Judge George C. Smith Magistrate Judge Chelsey M. Vascura

PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

For the reasons set forth in the Memorandum of Law in Support of Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, and in the Declarations of Peter Romer-Friedman, Galen Sherwin, Freda Levenson, and Derek Rotondo, the Parties respectfully request that the Court enter an Order:

- (1) finally certifying the Settlement Class as defined in the Joint Stipulation of Settlement Agreement and Release ("Agreement");
- (2) granting final approval of the Agreement;
- (3) granting any other relief that the Court deems just and proper.

Plaintiff submits a Proposed Order, attached hereto as Exhibit A, for the Court's convenience.

Dated: October 22, 2019 Respectfully submitted,

/s/ Freda Levenson

Freda Levenson (0045916)

Trial Attorney

AMERICAN CIVIL LIBERTIES UNION OF OHIO FOUNDATION

4506 Chester Avenue Cleveland, OH 44103 Telephone: (614) 586-1958 flevenson@acluohio.org

Peter Romer-Friedman

Pooja Shethji

OUTTEN & GOLDEN LLP

601 Massachusetts Ave NW Suite 200W Washington, DC 20001 Telephone: (202) 770-7886 prf@outtengolden.com pshethji@outtengolden.com

Deirdre Aaron

OUTTEN & GOLDEN LLP

685 Third Avenue, 25th Floor New York, New York 10017 Telephone: (212) 245-1000 daaron@outtengolden.com

Galen Sherwin

AMERICAN CIVIL LIBERTIES UNION WOMEN'S RIGHTS PROJECT

125 Broad Street, 18th Floor New York, NY 10004 Telephone: (212) 549-2644 gsherwin@aclu.org

Attorneys for Plaintiff and the Putative Class