UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

DANELL BEHRENS, individually, and on behalf of all others similarly situated,

Plaintiff,

vs.

LANDMARK CREDIT UNION, and DOES 1-100,

Defendants.

Case No.: 17-cv-101

Judge James Peterson

Assigned to Magistrate Stephen L. Crocker

PLAINTIFF DANELL BEHREN'S NOTICE OF UNOPPOSED MOTION AND UNOPPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiff Danell Behrens hereby moves this Honorable Court for entry of an Order to: (1) preliminarily approve the Settlement; (2) approve the proposed plan of notice to the Class; (3) appoint the lower bidding of the claims administrators from which bids are requested to provide the administration program outlined in this motion; and, (4) set a schedule of dates for further action on this Settlement Agreement, including a hearing pursuant to Rule 23(e) of the Federal Rules of Civil Procedure to determine whether the proposed Settlement is fair, reasonable, and adequate and should be finally approved.

This motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities, the accompanying Declaration of Taras Kick, the accompanying Declaration of Richard McCune, the accompanying Declaration of Arthur Olsen, the accompanying Declaration of Robert Weissman, the accompanying Declaration of Danell Behrens, other documents and papers on file in this action, and such other materials as may be presented before or at the

hearing on this motion, or as this Honorable Court may allow.

Dated: January 22, 2018

Respectfully submitted,

/s/ Taras Kick
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*Pro Hac Vice applications to be submitted

Counsel for Plaintiff Danell Behrens and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2018, a copy of the foregoing document was electronically filed using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

Respectfully submitted,

/s/ Robert Dart