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 BEHRENS' NOTICE OF MOTION AND MOTION FOR FINAL 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:

1. Finally approving the Settlement Agreement reached between Plaintiff and Defendants attached as Exhibit 1 to the Declaration of Taras Kick in Support of the Unopposed Motion for Preliminary Approval;

2. Approving class counsels' requested fee of $355,770.50;

3. Approving a service award to Class Representative Danell Behrens in the amount of $10,000; and

3. Approving Public Citizen Foundation and United Way of Greater Milwaukee & Waukesha County as the joint *cy pres* recipients, each receiving 50% of the residue.

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 Eric Kierkegaard of the claims administrator Garden City Group, LLC, 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: August 9, 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 August 9, 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_____