

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MICHELLE NELSON, individually and)	
on behalf of all others similarly situated,)	
)	
<i>Plaintiff,</i>)	No. 3-17-1114
)	
v.)	
)	Hon. Eli Richardson
NISSAN NORTH AMERICA, INC.,)	
a California corporation,)	
)	
<i>Defendant.</i>)	

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

NOW COME Plaintiffs, Michelle Nelson and John Anglin (“Plaintiffs”), through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 23, and hereby move this Honorable Court for entry of an Order finally approving the class action settlement reached between the Parties in this matter.

On August 16, 2019, the Court preliminarily approved the Parties’ Settlement Agreement, and found that the proposed Settlement satisfied Federal Rule of Civil Procedure 23, including requirements for the existence of numerosity, typicality, commonality, adequacy of representation, and manageability of the Settlement Class; that common issues of law predominate over individualized issues; and that settlement and certification of the Settlement Class is superior to alternative means of resolving the claims and disputes at issue. (Dkt. 83, ¶ 3).

As discussed in further detail in Plaintiffs’ concurrently-filed Memorandum of Law in Support, nothing has changed since the Court preliminarily approved the Settlement which would stand in the way of final approval. The Parties have executed the Notice Plan approved by the

Court, both direct and publication notice have been issued to the Settlement Class Members, and the Settlement Class Members have expressed overwhelming support for the Settlement.

Accordingly, Plaintiffs respectfully request that the Court enter an Order: (1) finding that the Settlement is fair, reasonable, and adequate; (2) granting final approval of the Settlement; (3) approving Plaintiffs' request for attorneys' fees, expenses, and Incentive Awards; and (4) granting such further and additional relief as the Court deems appropriate.

Dated: December 12, 2019

Respectfully submitted,

MICHELLE NELSON and JOHN ANGLIN,
individually and on behalf of a class of
similarly situated individuals

By: /s/ Evan M. Meyers
One of Plaintiffs' Attorneys

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Counsel for Plaintiffs and Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2019, a true and correct copy of *Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement* was served on the below counsel of record via the Court's ECF system:

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