

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

LISA HILL-GREEN, individually and on  
behalf of others similarly situated,

Plaintiff,

v.

Civil Action No. 3:19-cv-00708-MHL

EXPERIAN INFORMATION SOLUTIONS, INC.,

Defendant.

**JOINT MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiff, LISA HILL-GREEN, on behalf of herself and all others similarly situated, and Experian Information Solutions, Inc. entered into a class action settlement agreement (attached to the accompanying memorandum as Exhibit 1). Pursuant to Fed. R. Civ. P. 23(b)(2), the Plaintiff hereby moves the Court to certify a settlement class. Pursuant to Fed. R. Civ. P. 23(e), the Parties hereby move the Court for preliminary approval of the settlement agreement. The Parties respectfully request that the court enter a Preliminary Approval Order: preliminarily approving a proposed class settlement, scheduling a fairness hearing, certifying the proposed settlement class for purposes of the proposed class settlement, appointing class counsel, and approving the manner of notice proposed to be sent to all members of the settlement classes, and setting a new deadline for submission of a proposed third-party administrator and specific class notice. Plaintiff submits the accompanying memorandum in support of this request.

Respectfully submitted,

EXPERIAN INFORMATION  
SOLUTIONS, INC.

s/ David N. Anthony

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s/ Leonard A. Bennett

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