

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

LISA HILL-GREEN, *on behalf of herself
and all others similarly situated,*

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

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

JOINT MOTION FOR APPROVAL OF PROPOSED NOTICES

Plaintiff Lisa Hill-Green (“Plaintiff”), together with Defendant Experian Information Solutions, Inc. (“Defendant”), (jointly, the “Parties”), pursuant to ECF No. 92, submit for the Court’s review and approval, the attached Declaration of Dr. Shannon Wheatman of Kinsella Media, which includes the Parties’ proposed Long Form, Short Form, and Publication Notices of the preliminarily approved Rule 23(b)(2) class action settlement.

As incorporated in the proposed Notices, Plaintiff will be filing the Motion for Attorneys’ Fees, Costs, and Named Plaintiff Service Award a week earlier than required by the Court’s Preliminary Approval Order (ECF No. 88), on March 4, 2022, to give class members two weeks to evaluate the motion in advance of the objection deadline.

Respectfully submitted,
LISA HILL-GREEN,

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