

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**STEVEN F. COX, KELLY FREEMAN, RUFUS)
IRVING, KEITH FASON, ERNIE KIRK and)
DAVID NAGI Individually and on behalf of all)
similarly situated persons,)**

Plaintiffs,

vs.

CITY OF JACKSON, TENNESSEE,

Defendant.

**NO. 1:19-cv-01026-JDB-jay
JURY TRIAL DEMANDED
Rule 23 Class Action**

**MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND
PROVISIONAL CERTIFICATION OF SETTLEMENT CLASS**

Plaintiffs, through the undersigned counsel, move this Honorable Court for an order approving a proposed class action settlement, and the provisional certification of a settlement class, as detailed in the attached Settlement Agreement. Plaintiffs further move for an order designating Plaintiffs Rufus Irving and Keith Fason as representatives of the class and designating the undersigned counsel as class counsel. Plaintiffs rely on the accompanying Memorandum of Law and accompanying exhibits in support of this motion.

Respectfully submitted,

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court, and served all parties of record, by using the CM/ECF system.

s/ Michael L. Weinman

CERTIFICATE OF CONSULTATION

Plaintiffs' counsel have conferred with Defendant's counsel and counsel for Defendant's consent to the filing of this Motion.

s/ Michael L. Weinman