

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**VINCENT A. LAMONACA,
on behalf of himself and all others
similarly situated,**

Plaintiff,

v.

**FIRSTSTATES FINANCIAL SERVICES
CORP.,**

Defendant.

No.: 3:18-cv-11829(NLH)(KMW)

MOTION FOR ORDER DIRECTING NOTICE TO CLASS

Pursuant to Fed. R. Civ. P. 23(e), and for the reasons set forth more fully in the accompanying Memorandum of Law, Plaintiff Vincent A. LaMonaca moves the Court for an Order Directing Notice to the Class pursuant to the Settlement Agreement that has been reached between Plaintiff and Defendant FirstStates Financial Services Corp.

For the reasons set forth in the Memorandum and the supporting documents, the Settlement is fair, reasonable and adequate and serves the best interests of the Settlement Class Members. Accordingly, Plaintiff respectfully requests that the Court (1) find that it will likely be able to approve the proposed settlement under Fed. R. Civ. P. 23(e)(2) as amended, and certify the proposed Settlement Class for purposes of judgment on the Settlement; (2) approve the form, content, and method

of delivering notice to the Class as set out in the Settlement Agreement; and,
(3) schedule a final approval hearing.

Defendant does not contest the requested relief.

Respectfully submitted,

Dated: July 8, 2020

/s/ James A. Francis

James A. Francis

David A. Searles (*pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

Dated: July 8, 2020

By: /s/ James A. Francis
James A. Francis