

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

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2016 APR 14 PM 1:33
JULIE M. BROWN - CLERK

NICHOLAS WILLIS and BETH SHVARTS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

IHEARTMEDIA, INC., a Delaware
corporation,

Defendant.

Case No. 16 CH 02455

MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs Nicholas Willis and Beth Shvarts (together, “Plaintiffs”), by and through their undersigned counsel, hereby respectfully request that the Court enter an Order granting Preliminary Approval¹ to the Parties’ proposed class action Settlement of this matter. Plaintiffs’ motion is based upon this motion, the memorandum of points and authorities (and the exhibits attached thereto) in support of this motion, and the record in this matter, along with any oral argument that may be presented to the Court and evidence submitted in connection therewith at the hearing on this motion.

WHEREFORE, Plaintiffs Willis and Shvarts, individually and on behalf of the Settlement Class, respectfully request that the Court enter an Order (1) certifying the proposed Settlement Class for settlement purposes, (2) naming Plaintiffs as Class Representatives, (3) appointing Rafey S. Balabanian and Benjamin H. Richman of Edelson PC, Jeremy Glapion of the Glapion Law Firm, LLC, and Ari H. Marcus of Marcus & Zelman as Class Counsel, (4) granting Preliminary Approval to the Settlement, (5) approving the proposed Notice plan, (6)

¹ Except as otherwise indicated, all defined terms used herein shall have the same meanings ascribed to them in the Parties’ proposed Stipulation of Class Action Settlement.

scheduling a Final Approval Hearing, and (7) providing such other and further relief as the Court deems reasonable and just.

Respectfully submitted,

NICHOLAS WILLIS and **BETH SHVARTS**,
individually and on behalf of a class of similarly
situated individuals,

Dated: April 14, 2016

By: /s/ Benjamin H. Richman
One of Plaintiffs' attorneys

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**Pro hac vice* admission sought.

CERTIFICATE OF SERVICE

I, Benjamin H. Richman, an attorney, hereby certify that on April 14, 2016, I served the above and foregoing *Plaintiff's Motion for Preliminary Approval of Class Action Settlement*, by causing true and accurate copies of such paper to be placed in postage prepaid envelopes addressed to the persons shown below and depositing such envelopes in the U.S. Mailbox located at 350 North LaSalle Street, Chicago, Illinois 60654, on this the 14th day of April 2016.

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/s/ Benjamin H. Richman _____