

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS ED - 2
COUNTY DEPARTMENT, CHANCERY DIVISION

2016 JUL 22 AM 4:23

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

Honorable David B. Atkins

CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
CHANCERY DIV.

DOROTHY BROWN CLERK

MOTION FOR FINAL 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 Final Approval 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 Final Approval Hearing, which is scheduled for August 11, 2016 at 2:00 p.m.

WHEREFORE, Plaintiffs Willis and Shvarts, individually and on behalf of the Settlement Class, respectfully request that the Court enter an Order (1) granting final approval of the Parties' class action settlement, (2) overruling any and all objections raised thereto, and (3) 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: July 22, 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 July 22, 2016, I served the above and foregoing *Plaintiffs' Motion for Final Approval of Class Action Settlement*, by causing true and accurate copies of such paper to be sent via electronic mail to the person listed below, on this the 22nd day of July 2016.

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/s/ Benjamin H. Richman