

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

GEORGE NELSON, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

ROADRUNNER TRANSPORTATION)
SYSTEMS, INC.,)

Defendant.)

Civil Action No.: 1:18-cv-07400

Honorable Sara L. Ellis

PLAINTIFF’S MOTION FOR FINAL APPROVAL OF CLASS ACTION

SETTLEMENT

Plaintiff, through his undersigned counsel, respectfully files this Motion for Final Approval of Class Action Settlement, and moves the Court to enter the proposed Final Judgement:

1. finally certifying the Settlement Class¹ pursuant to Federal Rules of Civil Procedure 23(a) and 23(b);
2. finally approving the Settlement of this action as fair, reasonable, and adequate pursuant to Rule 23(e);
3. finally appointing Plaintiff as Settlement Class Representatives of the Settlement Class;
4. finally appointing John A. Yanchunis of Morgan & Morgan Complex Litigation Group and Shannon M. McNulty and Robert A. Clifford of Clifford Law Offices as “Class Counsel” for the Settlement Class;

¹ Unless otherwise defined, capitalized terms have the same meaning attributed to them in the Settlement Agreement (“SA”), previously filed at Doc. 44-6 and/or in the Memorandum filed in support of this motion.

5. finally appointing Epiq Systems, Inc. to serve as the Settlement Administrator, and Rodney Max as the Claims Referee;
6. finding that the Notice Program satisfied Rule 23 and due process; and
7. entering, in substantially similar form to Exhibit E of the Settlement Agreement (Doc. 44-6), the proposed Final Judgment and dismissing this case.

This Motion is based on the accompanying Memorandum of Law; the accompanying Declaration of Cameron Azari on behalf of Epiq, the declaration of John Yanchunis filed in support of this motion, and the Declarations of Class Counsel previously filed with the Court in connection with Plaintiff's Motion for Preliminary Approval, and all other records, pleadings and papers on file in this matter. Pursuant to the terms of the Settlement Agreement, Defendant does not oppose this Motion.

Dated: July 17, 2020

Respectfully submitted,

**MORGAN & MORGAN
COMPLEX LITIGATION GROUP**

/s/ John A. Yanchunis _____

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Attorneys for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 17, 2020, I electronically filed a true and correct copy of the foregoing unopposed motion with the Clerk of the Court using the CM/ECF system, which will send notification to all attorneys of record in this matter.

/s/ John A. Yanchunis
John A. Yanchunis (admitted *pro hac vice*)