

This motion is based on this Motion, Plaintiffs' Memorandum of Law in Support of Joint Motion for Final Approval of Settlement and Entry of Final Order and Judgment, and the declarations of Judge Diane M. Welsh (ret.), Timothy N. Mathews, John Spragens, Lana Lucchesi and Lee Bowron, and all supporting exhibits, the Complaint in this action, and such oral argument and any other matters as the Court may consider in deciding this motion. A proposed Order is attached hereto pursuant to Administrative Order No. 167.

Dated: September 20, 2021

Respectfully submitted,

/s/ Timothy N. Mathews
Timothy N. Mathews (*pro hac vice*)
Samantha E. Holbrook (*pro hac vice*)
Alex M. Kashurba (*pro hac vice*)
Zachary P. Beatty (*pro hac vice*)
CHIMICLES SCHWARTZ KRINER
& DONALDSON-SMITH LLP
One Haverford Centre
361 West Lancaster Avenue
Haverford, PA 19041
Telephone: (610) 642-8500
Facsimile: (610) 649-3633
tnm@chimicles.com
seh@chimicles.com
amk@chimicles.com
zpb@chimicles.com

Lead Class Counsel

John Spragens (TN Bar No. 31445)
SPRAGENS LAW PLC
311 22nd Ave. N.
Nashville, TN 37203
Telephone: (615) 983-8900
john@spragenslaw.com

Additional Class Counsel

Dated: September 20, 2021

Respectfully submitted,

/s/ *Brigid Carpenter*
Brigid M. Carpenter (TN Bar No. 18134)
**BAKER, DONELSON, BEARMAN,
CALDWELL BERKOWITZ, PC**
1600 West End Avenue
Suite 2000
Nashville, TN 37203
Phone: (615) 726-7341
bcarpenter@bakerdonelson.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2021, I electronically filed the foregoing Joint Motion for Final Approval of Settlement and and Entry of Final Order and Judgment with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

Brigid M. Carpenter (TN Bar No. 18134)
Paul T. Madden (BPR #037588)
BAKER, DONELSON, BEARMAN,
CALDWELL BERKOWITZ, PC
1600 West End Avenue
Suite 2000
Nashville, TN 37203
Phone: (615) 726-7341
bcarpenter@bakerdonelson.com
pmadden@bakerdonelson.com

Counsel for Defendant Nissan of North America, Inc.

/s/ Timothy N. Mathews
Timothy N. Mathews

Lead Class Counsel