

As described herein, the parties propose the following deadlines:

May 15, 2015 – Initial notices sent by mail

June 15, 2015 – Deadline for new Claimants to file Proof of Claim Form,² object, or opt out

June 22, 2015 – Class Administrator files final report with Court

June 22, 2015 – Parties file responses to any objections

_____, 2015 – Fairness hearing

In support of this Motion, the parties rely on the accompanying memorandum. Also, a proposed order is enclosed herewith.

Respectfully submitted,




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² As reflected in the supporting memorandum, claimants who participated in the District of Columbia Settlement will not need to submit a new claim form to be deemed eligible and participating in the Proposed Settlement. By default, such persons are automatically deemed participants in the Proposed Settlement without need for further action. Should any wish to opt out or exclude themselves, they can do so upon their own initiative.