

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

RUSSELL DOMITROVICH and THOMAS
GUSSIE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

M.C. DEAN, INC.,

Defendant.

Civil Action No. 1:23-cv-00210-CMH-JFA

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL AND TO DIRECT NOTICE
OF PROPOSED SETTLEMENT TO THE CLASS**

Plaintiffs move for entry of an order directing notice of the proposed class action settlement of the consumer cases and scheduling a hearing to consider final approval of the settlement. Plaintiffs are simultaneously filing a supporting memorandum of law and its supporting exhibits, which include the Settlement Agreement. For the reasons set forth in that memorandum, Plaintiffs respectfully request that the Court enter the proposed order submitted as Exhibit 3 to the Settlement Agreement attached as Exhibit 1 to the Memorandum in Support of this Motion filed herewith. For ease of reference, the capitalized terms in this motion and the accompanying memorandum have the meaning set forth in the Settlement Agreement.

Dated: January 29, 2024

Respectfully Submitted,

WEBSTER BOOK LLP

/s/ Steven T. Webster

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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Steven T. Webster
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