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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021CH00805
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

MATHEW LaPRADE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

INDECK POWER EQUIPMENT COMPANY,

Defendant.

Case No. 2021-CH-00805

The Honorable Eve M. Reilly

**PLAINTIFF'S NOTICE OF UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that on June 29, 2023, at 9:30 a.m., or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Eve M. Reilly, or anyone sitting in her stead, via Zoom (Meeting I.D.: 943 7767 4389 and Password: 980847) at the Daley Center, 50 W. Washington, Rm. 2305, Chicago, Illinois, and shall then and there present Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, a copy of which is attached hereto and hereby served upon you, to move the Court to:

- a. Enter an Order granting final approval of the Settlement and approving the requested Incentive Award and Fee Award.

Plaintiff's Motion is based on: this Notice of Motion; Plaintiff's Memorandum in Support of Unopposed Motion for Final Approval of Class Action Settlement; the Amended Settlement Agreement; the Declaration of Caroline P. Barazesh and all exhibits and attachments thereto; the Declaration of Philip L. Fraietta and all exhibits and attachments thereto; and the Proposed Final Order and Judgment submitted herewith.

Dated: June 15, 2023

Respectfully submitted,

/s/ Carl V. Malmstrom

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC**

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Local Counsel for Plaintiff and the Putative Class

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** Pro Hac Vice Application Forthcoming*

Class Counsel