

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

DURWIN HAMPTON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 6:21-CV-250-RAW-GLJ

**PLAINTIFF’S UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Plaintiff Durwin Hampton (“Plaintiff”), by and through his counsel, hereby respectfully requests that the Court, pursuant to Federal Rule of Civil Procedure 23, enter an order in the form prescribed in the proposed Preliminary Approval Order and set the following schedule:

EVENT	DEADLINES
Commencement of Class Notice Plan	On the date of entry of the Preliminary Approval Order.
Start of Period for Class Members to submit Class Member Identification Forms	On the date of entry of the Preliminary Approval Order.
Class Notice to be substantially completed	Thirty (30) days after the issuance of the Preliminary Approval Order
Plaintiff’s Motion, Memorandum of Law and Other Materials in Support of their Requested Award of Attorneys’ Fees and Expenses, and Request for Class Representative Service Award to be Filed with the Court	Thirty (30) days after the issuance of the Preliminary Approval Order
Plaintiff’s Motion, Memoranda of Law, and Other Materials in Support of Final Approval to be Filed with the Court	Thirty (30) days after the issuance of the Preliminary Approval Order
Deadline for Receipt of All Objections and Requests for Exclusion by Class Members	Sixty-five (65) days after the issuance of the Preliminary Approval Order

Deadline for filing Notice of Intent to Appear at Final Approval Hearing by Class Members and/or their Personal Attorneys	Sixty-five (65) days after the issuance of the Preliminary Approval Order
Deadline for Class Members to submit Class Member Identification Forms.	Sixty-five (65) days after the issuance of the Preliminary Approval Order
Deadline for Settlement Administrator to provide to Class Counsel and GM Counsel a final report detailing all proper and timely Requests for Exclusion	Seventy-five (75) days after the issuance of the Preliminary Approval Order
Any submission by the Parties concerning Final Approval of Settlement and Responses to any objections	Ninety (90) days after the issuance of the Preliminary Approval Order
Settlement Administrator Shall File the Results of the Dissemination of the Notice with the Court	No later than Twenty (20) days before the Final Approval Hearing
Final Approval Hearing	Within 120 days after the issuance of the Preliminary Approval Order

Plaintiff respectfully requests the Court set a hearing on the Motion on May 19, 2025, May 20, 2025, May 22, 2025, or May 23, 2025, in the United States District Court, Eastern District of Oklahoma, before Magistrate Judge Gerald L. Jackson.

Plaintiff bring this motion on the grounds that: (a) the proposed settlement is fair, adequate, and reasonable; (b) the proposed forms and methods of notice satisfy due process and are reasonably calculated to reach the Class Members and apprise them of the essential terms of the Settlement Agreement and their rights with respect thereto; and (c) the proposed Class satisfies for settlement purposes the requirements of Rules 23.

In support of this Motion, Plaintiff submits the contemporaneously-filed Memorandum of Points and Authorities, the accompanying Joint Declaration of Class Counsel, the Settlement Agreement and the exhibits thereto.

Dated: April 30, 2025

Respectfully submitted,

/s/ H. Clay Barnett, III
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W. Daniel “Dee” Miles III (*pro hac vice*)

J. Mitch Williams (*pro hac vice*)
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