

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

DARLENE GIBBS, *on behalf of  
themselves and all others similarly  
situated,*

Plaintiffs,

v.

Case No: 3:20-cv-00717-MHL

KENNETH REES,

Defendants.

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INDIA BANKS, *et. al., on behalf of  
themselves and all others similarly  
situated,*

Plaintiffs,

v.

Case No: 3:20-cv-00716-MHL

KENNETH REES,

Defendant.

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KIMETRA BRICE, *et al., on behalf of  
themselves and all others similarly  
situated,*

Plaintiffs,

v.

Case No: 3:20-cv-00732-MHL

KENNETH REES,

Defendants.

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**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Darlene Gibbs, Stephanie Edwards, Lula Williams, Patrick Inscho, Lawrence Mwethuku, Kimetra Brice, Earl Browne, Jill Novorot, India Banks, Alicia Patterson, JoAnn Griffiths, Jeri Brennan, Jessica Gringas, Angela Given, Vanessa Granger, Lilya McAtee, and Beverly Kristina Miller, by counsel, on behalf of themselves and the Settlement Class Members, and pursuant to Fed. R. Civ. P. 23, move the Court for Final Approval of the Class Action Settlement for the reasons outlined in the contemporaneously-filed memorandum of law. The Parties will submit a proposed order prior to the Final Approval Hearing.

Respectfully submitted,  
**PLAINTIFFS**

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