

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ARIS CIENEGA and ZAKEIA
HAMPTON, Individually and On Behalf
of All Others Similarly Situated,

Plaintiffs,

v.

ECHO GLOBAL LOGISTICS, INC.,

Defendant.

Case No. 1:22-cv-00644
Judge Sara L. Ellis

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS,
COLLECTIVE, AND REPRESENTATIVE ACTION SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs Aris Cienega and Zakeia Hampton's ("Plaintiffs") Unopposed Motion for Preliminary Approval of Class, Collective, and Representative Action Settlement, and supporting declarations and exhibits, Plaintiffs respectfully request that the Court enter an Order:

1. Granting preliminary approval of the settlement on the terms set forth in the Joint Stipulation of Class, Collective, and Representative Action Settlement and Release ("Settlement Agreement"), attached as Exhibit 1 to the Declaration of Melissa L. Stewart;
2. Conditionally certifying the proposed Illinois and California settlement classes, for settlement purposes only, under Federal Rule of Civil Procedure 23;
3. Appointing Outten & Golden LLP and Pedersen & Weinstein LLP as Class Counsel;
4. Conditionally certifying the proposed collective under the Fair Labor Standards Act, 29 U.S.C. § 216(b);

5. Approving the notices and proposed notice plan set forth in the Settlement Agreement, and directing the distribution of said notices;
6. Approving Rust Consulting, Inc. as the Settlement Administrator, and preliminarily approving the administration costs set forth in the Settlement Agreement;
7. Appointing Plaintiffs as Class Representatives; and
8. Scheduling a Final Approval Hearing for final approval of the Settlement Agreement no earlier than 150 days after granting preliminary approval.

In accordance with this Court's local rules, Plaintiffs will email a word copy of a proposed order to chambers for the Court's consideration.

Dated: August 19, 2022

Respectfully submitted,

By: /s/ Melissa L. Stewart

Outten & Golden LLP

Melissa L. Stewart (admitted *pro hac vice*)

Justin M. Swartz

685 Third Avenue, 25th Floor

New York, NY 10017

Telephone: (212) 245-1000

Facsimile: (646) 509-2060

E-Mail: mstewart@outtengolden.com

E-Mail: JMS@outtengolden.com

Molly J. Frandsen (admitted *pro hac vice*)

One California Street, 12th Floor

San Francisco, CA 94111

Telephone: (415) 638-8800

Facsimile: (415) 638-8810

E-Mail: mfrandsen@outtengolden.com

Ryan Cowdin (*pro hac vice application pending*)

601 Massachusetts Avenue NW,
Suite 200W

Washington, D.C. 20001

Telephone: (202)847-8800

Facsimile: (202)847-4410

E-Mail: rcowdin@outtengolden.com

Pedersen & Weinstein LLP

Erika Pedersen

33 N. Dearborn Street, Suite 1170

Chicago, IL 60602

Telephone: (312) 322-0710

Facsimile: (312) 322-0717

E-Mail: epedersen@pwllp.com

*Attorneys for Plaintiffs and the Proposed
Class and Collective Members and
Aggrieved Employees*