

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

|                                     |                        |
|-------------------------------------|------------------------|
| IN RE DIAL COMPLETE MARKETING AND ) | CASE NO. 11-md-2263-SM |
| SALES PRACTICES LITIGATION )        |                        |
| )                                   | (MDL DOCKET NO. 2263)  |
| )                                   |                        |
| )                                   | (ALL CASES)            |

**JOINT MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23 and Local Rule 23.1 and this Court’s Preliminary Approval Order dated January 2, 2019 (Dkt. No. 242) (the “Preliminary Approval Order”), plaintiffs Michelle Carter, Jonathan Cessna, Sonia Herrera, Jenny Marazzi, Kristina Pearson, Elizabeth Poynter, and Sven Vogtland, individually and as settlement class representatives (“Plaintiffs”), and Defendant Dial Corporation (“Defendant”) (collectively, the “Parties”), by their respective counsel, file this Joint Motion for Final Approval of Class Action Settlement (the “Joint Motion”) and incorporate by reference their Joint Memorandum of Law in Support of Joint Motion for Final Approval of Class Action Settlement which is filed herewith.

The Parties respectfully request that the Court enter an Order:

- (1) certifying a Settlement Class pursuant to Fed. R. Civ. P. 23(b)(3), as defined in the proposed Settlement Agreement and Release for settlement purposes only (the “Class”);
- (2) granting final approval of the proposed settlement of this class action on the terms set forth in the Settlement Agreement; and
- (3) granting such further relief as this Court deems just and proper.

Respectfully submitted,

Dated: April 29, 2019

/s/ Lucy J. Karl  
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***Attorneys for The Dial Corporation***

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 29, 2019, she caused this document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of filing to registered counsel of record for each party.

/s/ Lucy J. Karl  
Lucy J. Karl (NH Bar # 5547)