

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Yvonne Becker, Christopher Nobles, Rosa
Ramirez, Valerie Seyler, and Jannien
Weiner,

Plaintiffs,

v.

Wells Fargo & Co.; Employee Benefit
Review Committee; Wells Fargo Bank,
National Association, and John and
Jane Does, 1-20,

Defendants.

Case No. 0:20-cv-02016 (KMM/BRT)

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

CLASS ACTION

Plaintiffs Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, Jannien Weiner (collectively "Plaintiffs"), and the Class, by their counsel, respectfully move the Court for the entry of an order (1) granting final approval of the Class Action Settlement Agreement & Release dated March 8, 2022 (ECF No. 248-1), (2) certifying the Settlement Class and appointing Named Plaintiffs as Class Representatives and their counsel as Class Counsel, (3) finding the manner and form of giving notice of the Settlement and the Fairness Hearing to the Settlement Class satisfies the requirements of due process and the Court's Order Preliminarily Approving Class Action Settlement (ECF No. 256), (4) finding the notice provisions of the Class Action Fairness Act, 28 U.S.C. § 1715, were satisfied as of April 7, 2022 when Defendants sent the CAFA Notice approved by this Court to the appropriate state and federal officials, (5) granting approval of the Plan of Allocation (ECF No. 248-2), and (6) granting such other relief as set forth in

the [Proposed] Order Granting Final Approval of Class Action Settlement and Entering Final Judgment and Dismissal submitted herewith.

This Motion is based on Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement, the Declaration of Michelle C. Yau in Support of Plaintiffs' Motion and attached Exhibits, and the Declarations of Analytics Consulting, LLC (the Settlement Administrator), Tulio Chirinos, and Plaintiffs Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, and Jannien Weiner, all of which have been filed with this Motion, as well as argument of counsel and the record on file.

Dated: June 30, 2022

By: /s/ Erin Riley
KELLER ROHRBACK L.L.P.
Erin Riley, *pro hac vice*
1201 Third Ave, Suite 3200
Seattle, WA 98101
Tel: (206) 623-1900
eriley@kellerrohrback.com

**COHEN MILSTEIN SELLERS & TOLL
PLLC**
Michelle C. Yau, *pro hac vice*
Ryan A. Wheeler, *pro hac vice*
1100 New York Ave. NW, Suite 500
Washington, DC 20005
Tel: (202) 408-4600
myau@cohenmilstein.com
rwheeler@cohenmilstein.com

ZIMMERMAN REED LLP
June P. Hoidal (MN No. 033330X)
Charles R. Toomajian (MN No. 0397879)
1100 IDS Center, 80 South 8th Street
Minneapolis, Minnesota 55402
Tel: (612) 341-0400
June.Hoidal@zimmreed.com

Charles.Toomajian@zimmreed.com

***Counsel for Plaintiffs and the Preliminary
Approved Settlement Class***