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Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JUAN ROMERO, FRANK
TISCARENO, and KENNETH
ELLIOTT on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

SECURUS TECHNOLOGIES, INC.,
Defendant.

Case No. 16-CV-1283-JM-MDD

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 5, 2020
Time: 8:30 a.m.
Ctrm.: 5D
Judge: Hon. Jeffrey T. Miller

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on June 5, 2020 at 8:30 a.m., or as soon thereafter as this matter may be heard before the Honorable Jeffrey T. Miller, in Courtroom 5D of the Edward J. Schwartz United States Courthouse, located in Suite 5190, 221 West Broadway, San Diego, California 92101, Plaintiffs Kenneth Elliott, Juan Romero, and Frank Tiscareno (“Plaintiffs”) will, and hereby do, move this Court for an order: (1) certifying the Class for settlement purposes; (2) appointing Plaintiffs as Class representatives; (3) appointing Foley & Lardner LLP, the Law Offices of Ronald A. Marron, APLC, and the Law Office of Robert L. Teel as Class counsel; (4) granting preliminary approval of the proposed Settlement Agreement reached between Plaintiffs and Defendant Securus Technologies, Inc.; (5) ordering notice be given to the Class Members; and (6) scheduling a final approval hearing.

Plaintiffs’ counsel have conferred with counsel for Defendant who do not oppose this motion. The motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points and Authorities, Declaration of Robert Teel, and proposed Order filed herewith; (3) the Settlement Agreement; (4) the pleadings and papers on file in this action; and (5) such other written or oral argument as may be presented to the Court.

Dated: May 18, 2020

Respectfully submitted,

By: /s/ Robert L. Teel

Robert L. Teel

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