

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION**

ARKONA, LLC and DIANNE KASBOB, on
behalf of themselves and all those similarly
situated,

Case No.: 1:19-cv-12372
Hon. Thomas L. Ludington

Plaintiffs,

v.

COUNTY OF CHEBOYGAN and COUNTY
OF MONROE,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

For the reasons set forth in the following brief, Plaintiffs respectfully request that the Court: (1) grant preliminary approval of the Settlement Agreement, concluding that it will likely be able to certify the Class and Sub-Classes under Fed. R. Civ. P. 23(b)(3) in connection with the settlement process; (2) decertify the current plaintiff class consistent with the Settlement Agreement, subject to the provision that the current certified class will be reinstated *nunc pro tunc* to the day before the preliminary approval order is issued if the Settlement is terminated for any reason; (3) appoint Matthew E. Gronda and Philip L. Ellison interim counsel for the proposed Class and Sub-Classes under Fed. R. Civ. P. 23(g)(3); (4) approve the Notice Plan for the Settlement as well as the Notice of Class Action and Proposed Settlement and

direct distribution of that Notice; (5) approve the Claim Form; and (6) schedule a final Fairness Hearing for the Court to hear any objections to the Settlement and determine whether the Settlement warrants final approval. A proposed order granting this motion is attached as **Exhibit 1**.

The undersigned counsel certifies that he communicated with opposing counsel regarding the nature of the relief sought by this motion and sought concurrence in the same. Defendants do not oppose this motion, and the relief requested herein with the proviso that if anything in this motion or request for relief is inconsistent with the Settlement Agreement, the Settlement Agreement controls.

August 6, 2025

/s/ Matthew E. Gronda

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