

IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

DAWN CALLENDER, individually and on  
behalf of other persons similarly situated,

Plaintiff,

v.

QUALITY PACKAGING SPECIALISTS  
INTERNATIONAL, LLC,

Defendant.

Case No.: 2023LA000231

Honorable Dennis Ruth

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

Plaintiff Dawn Callender, individually and on behalf all others similarly situated, hereby  
moves this Court to:

- a. Schedule a Fairness Hearing on the question of whether the proposed Class Action Settlement should be approved as fair, reasonable, and adequate;
- b. Approve the form and content of the proposed Notice to the Settlement Class;
- c. Approve the proposed method of requesting exclusion from the Settlement;
- d. Direct the mailing of the Notice by first-class mail to the Settlement Class Members;
- e. Preliminarily approve the Settlement; and
- f. Preliminarily certify the Settlement Class, for purposes of settlement only.

Plaintiff's Motion is based on the following attachments hereto: (i) Plaintiff's Memorandum in Support of Unopposed Motion for Class Action Settlement and (ii) the Declaration of Roberto Luis Costales, including all exhibits and attachments to the Costales Declaration, including the Settlement Agreement, which includes the Parties' draft Notice and Proposed Preliminary Approval Order.

Dated: April 3, 2023

***Respectfully submitted,***

*/s/ Roberto Luis Costales*

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