

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Bonnie Berthiaume, Robert Berthiaume,
Doris Burnham, Richard Burnham, Nancy
Mayer-Gosz, Fletcher Lewis, and Carole
Lewis,

Court File No.: 27-CV-17-15118
Case Type: Other Contract / Other Civil
Judge Laurie J. Miller

Plaintiffs,

vs.

Allianz Life Insurance Company of North
America and Imeriti, Inc. d/b/a Imeriti
Financial Network,

**NOTICE OF UNOPPOSED MOTION
AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT AND ORDER
DIRECTING ISSUANCE OF CLASS
SETTLEMENT NOTICE**

Defendants.

PLEASE TAKE NOTICE that on September 15, 2020 at 1:00 p.m., Class Representatives will bring an unopposed motion for preliminary approval of class settlement and order directing issuance of the class settlement notice, before the Honorable Laurie J. Miller, at the Hennepin County Courthouse, 12601 Ridgedale Dr., Minnetonka, MN 55305.

MOTION

Class Representatives respectfully move the Court under Minn. R. Civ. P. 23.05 to preliminarily approve the parties' class settlement and issue an order directing issuance of the class settlement notice.

This unopposed motion is based on a memorandum of law and affidavits, filed contemporaneously in accordance with the requirements of Minnesota General Rules of

Practice 115, the arguments of counsel, and all files, records, and proceedings in this action.

ACKNOWLEDGMENT

The undersigned acknowledges that sanctions may be awarded under the circumstances set forth in Minn. Stat. § 549.211.

BEST & FLANAGAN LLP

Dated: September 1, 2020

By: /s/Jennifer L. Olson
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