

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

THOMAS BAKER, <i>et al.</i> , individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:16-cv-1693-RHH
)	
THE CITY OF FLORISSANT,)	
)	
Defendant.)	

MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs and Class Representatives Thomas Baker, Sean Bailey, Nicole Bolden, Allison Nelson, and Umi Okoli (f.k.a. Meredith Walker), by and through Class Counsel, hereby request this Court issue a final Order approving the terms of a proposed class action Settlement. In support of this Motion, and for the reasons more fully set forth in the accompanying Memorandum of Law in Support, Plaintiffs state as follows:

1. The Court previously granted preliminary approval of the parties’ proposed class Settlement on January 2, 2024, finding the terms sufficiently fair, reasonable, and adequate to send notice to the Classes and proceed to a formal fairness determination. Dkt. No. 289 (“Order”). Pursuant to that Order, Plaintiffs now file this Motion for Final Approval of Class Action Settlement, asking that the Court grant final approval of the proposed Settlement and enter the proposed form of judgment.

2. After years of hotly contested litigation and extensive settlement negotiations, the Parties reached a proposed Settlement of this civil rights class action. On or about September 20, 2023, the Parties executed a class action Settlement Agreement (“Settlement Agreement” or “Settlement”), a copy of which is attached hereto as **Exhibit 1**. *See also* Dkt. No. 287-1.

3. For the reasons set forth herein and in the attached Memorandum of Law in Support, the proposed Settlement Agreement between the Plaintiffs and the City of Florissant is fair, reasonable, and adequate. The Settlement is the product of arm's length negotiations between Plaintiffs' counsel ("Class Counsel") and Defendant, City of Florissant ("Florissant").

4. The Settlement provides Class Members with substantial and immediate monetary and equitable relief and Florissant with certainty and finality, while avoiding the inherent risks, delays, and expenses associated with continued, protracted class action litigation.

5. Accordingly, and consistent with the Memorandum of Law in Support, filed herewith, the Parties respectfully request that the Court grant final approval of the proposed settlement.

WHEREFORE, Plaintiffs hereby move this Court for an Order and Judgment (1) approving the terms of the proposed class action Settlement, (2) approving Class Counsel's application for an award of attorneys' fees and costs and Plaintiff Class Representative service awards, and (3) entering a Final Approval Order and Judgment consistent with these findings.

Dated: April 8, 2024

Respectfully submitted,

By: /s/ Nathaniel R. Carroll

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