

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

KEDDRICK BROWN, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

PROGRESSIVE MOUNTAIN  
INSURANCE COMPANY,

Defendant.

Consolidated Case No.:  
3:21-cv-00175-TCB

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MICHELLE BOST, individually and  
on behalf of all others similarly  
situated,

Plaintiff,

v.

PROGRESSIVE PREMIER  
INSURANCE COMPANY OF  
ILLINOIS,

Defendants.

**PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs, Keddrick Brown and Michelle Bost, hereby move this Court for an order (i) granting final approval

of the Settlement as fair, reasonable, and adequate; (ii) certifying the Settlement Classes; (iii) finding that the notice program effectuated pursuant to the Preliminary Approval Order satisfies the requirements of Federal Rule of Civil Procedure 23(c) and due process and constitutes the best notice practicable under the circumstances; and (iv) enter final judgment.

In further support of this Motion, Plaintiffs incorporate by reference the accompanying Memorandum of Law (Exhibit 1) and submit the Declaration of Cameron R. Azari, Esq. on Commencement of Settlement Notice Plan.

Respectfully submitted this 31st day of March, 2025.

/s/ Jake Phillips

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*Counsel for Plaintiffs and the Classes*

**CERTIFICATE OF SERVICE**

I, Jacob L. Phillips, hereby certify that on this 31st day of March, 2025, I electronically filed the foregoing via the Court's CM/ECF system, which will provide electronic notification to all counsel of record.

/s/Jake Phillips

Attorney for Plaintiffs