

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No. 1:19-CV-20592-MARTINEZ/OTAZO-REYES

VASSILIOS KUKORINIS, on behalf of
himself and those similarly situated,

Plaintiff,

v.

WALMART, INC., a Delaware
corporation

Defendant.

**PLAINTIFF’S UNOPPOSED MOTION TO DIRECT CLASS NOTICE AND GRANT
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND
INCORPORATED MEMORANDUM OF LAW¹**

Plaintiff Vassilios Kukorinis (“Plaintiff”), respectfully moves for an order directing class notice and granting preliminary approval of the proposed class action settlement with Defendant Walmart, Inc. (“Walmart” or “Defendant”) (together, the Plaintiff and Walmart are referred to as the “Parties”), the terms of which are set forth in the “Settlement Agreement and Release” (“Settlement Agreement”), attached hereto as **Exhibit 1**. In so moving, Plaintiff respectfully requests the Court: 1) enter the Proposed Order directing dissemination of the Class Notice, attached as Exhibit D to the Settlement Agreement; 2) appoint Epiq Class Action and Claims Solutions, Inc., as the Claims Administrator; 3) certify the Settlement Class as defined herein; 4) appoint Plaintiff as Class Representative for the Settlement Class; 5) appoint Plaintiff’s Counsel

¹ Walmart does not concede the Plaintiff’s allegations, nor does it concede all of the factual statements set forth herein. For purposes of this Settlement, however, Walmart does not oppose the filing of this Motion for Preliminary Approval.

as Settlement Class Counsel; 6) approve the establishment of the Qualified Settlement Fund; and
7) set a hearing for the purpose of deciding whether to grant final approval of the Settlement.

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