

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

FIRST CHOICE FEDERAL CREDIT UNION
and FINANCIAL HORIZONS CREDIT
UNION, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

SLIM CD, INC.,

Defendant.

Case No. 2:25-cv-01088-MRH

**PLAINTIFFS' UNOPPOSED MOTION FOR AN ORDER
AUTHORIZING NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs First Choice Federal Credit Union and Financial Horizons Credit Union ("Plaintiffs") hereby move this Court for entry of an Order: (1) granting preliminary approval of the proposed Class Action Settlement Agreement and Release between themselves and Defendant Slim CD, Inc. ("Defendant"); (2) provisionally certifying the proposed Settlement Class; (3) conditionally appointing Plaintiffs as Settlement Class Representatives; (4) conditionally appointing Joseph P. Guglielmo of Scott+Scott Attorneys at Law LLP and Gary F. Lynch of Lynch Carpenter LLP as Settlement Class Counsel; (5) approving the form and manner of notice; (6) ordering that notice be disseminated to the Settlement Class according to the Settlement's terms; (7) establishing deadlines for Settlement Class Members to request exclusion from the Settlement Class, file objections to the Settlement, or file claims; and (8) setting the proposed schedule for completion of further settlement proceedings, including scheduling the final fairness hearing.

This Motion is based upon the record in this case as well as the concurrently filed: (1) Plaintiffs' Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval; (2) the Joint Declaration of Joseph P. Guglielmo and Gary F. Lynch and the exhibits attached thereto; and (3) the Declaration of Richard Simmons, as well as any additional materials and argument that may be presented to the Court.

In advance of filing this motion, Counsel for Plaintiffs conferred with Counsel for Defendant and Defendant does not oppose this motion.

Dated: May 13, 2026

Respectfully submitted:

/s/ Gary F. Lynch

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