

**IN THE CIRCUIT COURT OF WINNEBAGO COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

HEATHER HUGHES- RICHMOND, individually and on behalf of all others similarly situated,	:	NO.: 2023-LA-370
	:	
	:	CLASS ACTION
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
WALDOM ELECTRONICS CORPORATION,	:	
	:	
Defendant.	:	

**PLAINTIFF’S UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Heather Hughes-Richmond (“Plaintiff”), through his undersigned counsel, respectfully submits the following Motion for Final Approval of Class Action Settlement pursuant to 735 ILCS 5/2-801, and states:

1. Plaintiff filed this putative class action against Defendant Waldom Electronics Corporation. (“Defendant”) alleging violations of Illinois’ Biometric Information Privacy Act (“BIPA”), 740 ILCS 14/1, *et seq.*
2. On May 16, 2024, Plaintiff and Defendant executed a Settlement Agreement and Release that would resolve the claims of Plaintiff and all putative class members in this matter.
3. On May 30, 2024, this Court granted preliminary approval to the proposed class action settlement agreement set forth in the Parties’ Settlement Agreement and Release. The Court also provisionally certified the Settlement Class for settlement purposes, approved the procedure for giving Class Notice to the members of the Settlement Class, and set a Final Approval Hearing to take place on September 4, 2024.

4. Pursuant to this Court's Preliminary Approval Order, the class administrator sent Class Notice to all class members of the settlement in the manner approved by the Court.

5. No class members opted out or objected to the class settlement.

6. As set forth more fully in Plaintiff's accompanying memorandum, the proposed Settlement is fair, reasonable, and adequate, and should therefore be granted final approval.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant this unopposed Motion and enter the Proposed Order Granting Final Approval of Class Action Settlement Agreement, entering judgment, with prejudice, in favor of Defendant on Plaintiff's and all other class members' claims against the Defendant, and approving the Service Award to Plaintiff and Attorney's Fees and Expenses to Class Counsel.

Dated: August 20, 2024

Respectfully submitted,

s/ Mark Hammervold

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¹ Ms. Dapeer filed her Rule 707 statement on April 24, 2024.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing pleading was served this 20th day of August, 2024 through the electronic filing platform and by e-mail, and properly addressed to:

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s/Mark Hammervold