

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL
SERVICES PROGRAM, NATIONAL
CONSUMER LAW CENTER, and
ALLIANCE FOR JUSTICE, for themselves
and all others similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendant.

Civil Action No. 16-745 ESH

**PLAINTIFFS' UNOPPOSED MOTION FOR APPROVAL OF
REVISED PLAN OF CLASS NOTICE AND CLASS NOTICE DOCUMENTS**

On April 3, 2017, the parties received an email from the Court requesting a call with parties to discuss questions about and revisions to the Proposed Plan of Class Notice (ECF Nos. 37 (Unopposed Motion) and 37-4 (Proposed Order)). The parties spoke with the Court by phone on April 4, 2017. As requested, Plaintiffs file this Unopposed Motion for Approval of Revised Class Notice Plan and Class Notice Documents.

Attached as Exhibit 1 is a revised version of the Email Notice (previously ECF 37-1). Plaintiffs have revised this document to be consistent with the Court's comments, and have attached as Exhibit 1-A a blacklined version of the Email Notice, which shows the revisions. Plaintiffs intend to send this notice in the body of an email. The sender's name will appear as PACER Fees Class Action Administrator, and the subject line of the email will be "PACER Fees – Notice of Class Action Lawsuit."

Attached as Exhibit 2 is a revised version of the Postcard Notice (previously ECF 37-2). Plaintiffs have revised this document to be consistent with the Court's comments, and have attached as Exhibit 2-A a blacklined version of the Postcard Notice, which shows the revisions.

Attached as Exhibit 3 is a revised version of the long-form notice (previously ECF 37-3), which will appear on the class website at www.PACERFeesClassAction.com. Plaintiffs have revised this document to be consistent with the Court's comments, and have attached as Exhibit 3-A a blacklined version of the Website Notice, which shows the revisions.

Attached as Exhibit 4 is a mock-up of an online exclusion form, which will be available on the class website and hyperlinked in the email notice. Class members will be able to complete and submit the form online.

Attached as Exhibit 5 is a printable exclusion form, which will be available on the class website. Class members will be able to print the form, complete it by hand, and mail it to the Class Administrator.

Attached as Exhibit 6 is a [Proposed] Order Approving Plan of Class Notice (previously ECF 39-1). Plaintiffs have revised this document to be consistent with the Court's comments, and have attached as Exhibit 6-A a blacklined version of the [Proposed] Order Approving Plan of Class Notice, which shows the revisions.

Plaintiffs respectfully request that the Court grant Plaintiffs' Unopposed Motion for Approval of Revised Class Notice Plan and Class Notice Documents.

Dated: April 13, 2017

Respectfully submitted,

By: /s/ William H. Narwold
MOTLEY RICE LLC

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Class Counsel

CERTIFICATE OF SERVICE

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a principal of the law firm MOTLEY RICE LLC, and my office is located at One Corporate Center, 20 Church Street, 17th Floor, Hartford, CT 06103.

On April 13, 2017, I caused to be filed the following in the above-captioned case:

**Plaintiffs' Unopposed Motion for Approval of
Revised Plan of Class Notice and Class Notice Documents**

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 13, 2017

Respectfully submitted,

By: /s/ William H. Narwold
William H. Narwold
MOTLEY RICE LLC