

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

PRECISION ROOFING OF N.
FLORIDA INC. individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CENTERSTATE BANK,

Defendant.

Case No.: 3:20-cv-352-BJD-LLL

ANGELA DENISE GRANT, on behalf
of herself and all persons similarly
situated,

Plaintiff,

v.

CENTERSTATE BANK,

Defendant.

Case No.: 8:20-cv-01920-BJD-AAS
(Administratively Closed)

**PLAINTIFFS' UNOPPOSED MOTION TO AMEND FINAL APPROVAL
SCHEDULE SET FORTH IN ORDER CERTIFYING SETTLEMENT CLASS**

Plaintiffs, Precision Roofing of N. Florida Inc. and Angela Denise Grant, respectfully move for entry of an Order that reschedules the Final Approval Hearing and, in conjunction, modifies the deadlines leading up to that hearing that are included in the Court's Order Certifying Settlement Class dated June 21, 2023. Dkt. 79. This is necessary to ensure sufficient time exists to the complete the Notice Program.

Plaintiff's expert recently completed his analysis to complete the Settlement

Class list, which has now been delivered to Defendant. Defendant is actively working to add the Settlement Class member names, addresses, and email addresses before delivering the Settlement Class list to the Settlement Administrator, which process involves accessing Defendant's legacy data not currently available on Defendant's operational system and may well require manual analysis of the data. Defendant anticipates it will be able to deliver the list to the Settlement Administrator by August 1, 2023. Thereafter, the Settlement Administrator has confirmed that it should be able to initiate the Notice Program, sending Email Notices and Postcard Notices, by August 31, 2023. Thereafter, the Settlement Administrator needs approximately 15 additional days to complete the Notice Program, including the remailing of any Notices returned undeliverable by the United States Postal Service.

As the Court will recall, the deadlines to complete the Notice Program; to file the Motion for Final Approval and Application for Attorneys' Fees and Costs; to opt-out of or object to the Settlement; and to respond to any objections are tied to the Final Approval Hearing date. Therefore, Plaintiffs respectfully request that the Court's Order granting this Motion set the following new schedule, to work around the Thanksgiving holiday:

Event	Current Deadline	Proposed Deadline
Deadline to Complete Notice Program	July 20, 2023 (60 days before Final Approval Hearing)	September 21, 2023
Deadline to File Motion for Final Approval and Application for	August 4, 2023 (45 days before Final Approval Hearing)	October 6, 2023

Attorneys' Fees and Costs		
Deadline for Settlement Class members to Opt-Out of the Agreement	August 21, 2023 (30 days before Final Approval Hearing)	October 21, 2023
Deadline for Settlement Class Members to Make Objections	August 21, 2023 (30 days before Final Approval Hearing)	October 21, 2023
Deadline for Respond to Objections (if any)	September 5, 2023 (15 days before Final Approval Hearing)	November 5, 2023
Final Approval Hearing	September 20, 2023, at 2:00 p.m.	November 20, 2023, at __:__ a.m./p.m. (or as soon thereafter as available on the Court's calendar)

Plaintiffs propose the Court enter an Amended Order Certifying Settlement Class that includes the new Court-approved schedule, as it is necessary to post the order preliminarily approving the Settlement on the Settlement Website. Alternatively, the Court should enter a more summary order amending the schedule, which will be posted on the Settlement Website with the existing Order Certifying Settlement Class.

WHEREFORE, Plaintiffs respectfully request entry of an Order granting this Motion.

RULE 3.01(g) CERTIFICATION

The undersigned counsel for Plaintiffs hereby certify that they have conferred with counsel for Defendant regarding the subject matter of this Motion and that all Parties agree to the relief sought.

Dated: July 19, 2023

Respectfully submitted,

/s/ Jonathan M. Streisfeld

Jeffrey Ostrow FBN 121452
Jonathan M. Streisfeld FBN 117447
KOPELOWITZ OSTROW P.A.
One West Las Olas Blvd., Suite 500
Fort Lauderdale, Florida 33301
Telephone: 954-525-4100
ostrow@kolawyers.com
streisfeld@kolawyers.com

Jeffrey Kaliel (admitted *pro hac vice*)
KALIELGOLD PLLC
1100 15th St. NW 4th Floor
Washington, D.C. 20005
Tel: (202) 350-4783
jkaliel@kalielpllc.com

Class Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 19, 2023, the foregoing document was filed electronically on the CM/ECF system, which caused all CM/ECF participants to be served by electronic means.

/s/ Jonathan Streisfeld

Jonathan M. Streisfeld