

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

TIMOTHY HASTON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

RESURGENT CAPITAL SERVICES, L.P.,
FRONTLINE ASSET STRATEGIES, LLC,
and JOHN DOES 1-5,

Defendants.

Case No. 2:20-cv-01008-WSH

**PLAINTIFF’S MOTION TO CERTIFY CLASS FOR SETTLEMENT PURPOSES
AND FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Timothy Haston seeks preliminary approval of the Parties’ proposed Settlement Agreement (the “Agreement”). Plaintiff respectfully requests that the Court grant: preliminary approval of the Agreement; certify the Class defined in the Agreement for purposes of settlement and proving notice of the Agreement to the Class; approve the content, form, and method of delivering notice to the Class as set forth in the Agreement; and schedule a final approval hearing in accordance with the deadlines proposed in the Agreement. In support of this request, Plaintiff submits the accompanying brief and declaration. For the reasons set forth in the accompanying brief, Plaintiff respectfully requests that the Court enter the Preliminary Approval Order attached to this motion, grant preliminary approval, certify the proposed Class, and approve the notice plan to provide the proposed Class notice of the Parties’ Agreement.

Respectfully submitted,

Dated: January 5, 2024

By: /s/ Kevin Abramowicz
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CERTIFICATE OF SERVICE

I hereby certify that, on January 5, 2024, this Plaintiff's Motion To Certify Class For Settlement Purposes And For Preliminary Approval Of Class Action Settlement was served by electronic means via the Court's CM/ECF system upon the following:

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