UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA FORT PIERCE DIVISION

ELLEN BERMAN and DAYANA GUACH on behalf of themselves and all others similarly situated,

CASE NO. 2:18-cv-14371 ROSENBERG/MAYNARD

Plaintiffs,

v.

GENERAL MOTORS LLC, a Delaware limited liability company,

Defendant.

JOINT NOTICE OF SETTLEMENT

Plaintiffs Ellen Berman and Dayana Guach ("Plaintiffs") and Defendant General Motors LLC ("GM") notify the Court that they have reached agreement on a "Settlement Agreement and Release" to resolve all matters herein on a classwide basis, and that the parties are in the process of obtaining the final signatures on the settlement agreement.

Plaintiffs anticipate that they will file a motion for preliminary approval of the settlement with the Court no later than Friday, April 26, 2019.

Based on the foregoing, the parties respectfully request that all existing deadlines, including GM's deadline for filing a responsive pleading, be suspended pending the filing of the motion for preliminary approval with this Court. A proposed Order is attached.

Dated: April 22, 2019 Respectfully submitted,

/s/ Rachel Soffin

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{N3807855.1}

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CERTIFICATE OF SERVICE

The undersigned hereby states a copy of the foregoing was served through the Court's CM/ECF system on all parties of record on April 22, 2019.

/s/ Laurie M. Riley

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA FORT PIERCE DIVISION

| ELLEN BERMAN and DAYANA GUACH | | | | | | |
|--------------------------------------|--------|----|------------|-----|-----|--------|
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CASE NO. 2:18-cv-14371 ROSENBERG/MAYNARD

Plaintiffs,

v.

GENERAL MOTORS LLC, a Delaware limited liability company,

Defendant.

ORDER SUSPENDING ALL DEADLINES PENDING THE FILING OF THE MOTION FOR PRELIMINARY APPROVAL

THIS CAUSE is before the Court on the parties' Joint Notice of Settlement, DE ___, filed herein by Plaintiffs Ellen Berman and Dayana Guach ("Plaintiffs') and Defendant General Motors LLC ("GM"). The Court has considered the Notice, the record and is otherwise fully advised in premises. Accordingly,

IT IS HEREBY ORDERED AND ADJUDGED:

- 1. Plaintiffs shall file their motion for preliminary approval with the Court no later than April 26, 2019.
- 2. All deadlines in the case, including GM's deadline for filing a responsive pleading, are suspended pending the filing of the motion for preliminary approval.

DONE AND ORDERED in Chambers, West Palm Beach, Florida, this _____ day of April, 2019.

ROBIN L. ROSENBERG UNITED STATES DISTRICT JUDGE

Copies furnished to: Counsel of Record