

DOCKET NO. X03 HHD-CV14-6055537-S	:	SUPERIOR COURT
	:	
HOLLY CHANDLER AND DEVON ANN CONOVER,	:	COMPLEX LITIGATION DOCKET
	:	
PLAINTIFFS,	:	AT HARTFORD
	:	
VS.	:	
	:	
DISCOUNT POWER, INC.	:	
	:	
DEFENDANT	:	FEBRUARY 1, 2017

**PLAINTIFFS’ MOTION FOR CERTIFICATION OF SETTLEMENT CLASS AND  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Holly Chandler and Devon Ann Conover (“Plaintiffs”), individually and on behalf of the proposed Settlement Class,<sup>1</sup> respectfully moves that the Court:

- (a) Certify the Settlement Class for settlement purposes pursuant to Sections 9.7 and 9.8(3) of the Practice Book;
- (b) Approve the Settlement Agreement; and
- (c) Approve the Plan of Allocation.

In support of this Motion, Plaintiff represents that: (1) the Settlement Class has received full and fair notice of the Settlement in accordance with the Notice Plan approved by the Court in its Preliminary Approval Order [Dkt No. 119]; (2) the Settlement class meets the numerosity, commonality, typicality, adequacy, predominance and superiority requirements of Sections 9.7 and 9.8(3) of the Practice Book and therefore should be certified; and (3) both the Settlement and

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<sup>1</sup> All capitalized terms have the meaning set out in the Settlement Agreement, attached to the Affidavit of Seth R. Klein in Support of Plaintiffs’ Motion for Certification of Settlement Class and Final Approval of Class Action Settlement and Motion for Award of Attorneys’ Fees & Expenses and for Case Contribution Awards (“Klein Aff.”), as Exhibit A.

the Plan of Allocation are fair, reasonable and adequate and merit final approval. In further support of this Motion, Plaintiffs have filed a Memorandum of Law, supporting affidavits from Seth R. Klein, Holly Chandler, Devon Ann Conover, and Senior Project Manager Scott DiCarlo (on behalf of Notice and Claims Administrator KCC Class Action Services, LLC), together with a Proposed Order.

Dated: February 1, 2017

PLAINTIFFS,  
HOLLY CHANDLER AND  
DEVON ANN CONOVER

By: /s/ Seth R. Klein  
Robert A. IZARD  
Seth R. Klein  
IZARD KINDALL & RAABE LLP  
(Juris No. 410725)  
29 South Main Street, Suite 305  
West Hartford, CT 06107  
(860) 493-6292

**CERTIFICATION**

Pursuant to Practice Book § 10-14, I hereby certify that a copy of the above was mailed or electronically delivered on February 1, 2017 to all counsel and pro se parties of record.

James T. Shearin  
David P. Atkins  
Pullman & Comley, LLC  
850 Main Street, P.O. Box 7006  
Bridgeport, CT 06601-7006

/s/ Seth R. Klein  
Seth R. Klein