

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

JEAN HECKMANN, ERIC)
LaFOLLETTE and CAMILLE)
LaFOLLETTE, individually and on)
behalf of others similarly situated,)
)
Plaintiffs,)
)
-vs-)
)
LIBERTY MUTUAL FIRE)
INSURANCE COMPANY,)
)
Defendant.)

Case No.: 2:14-CV-04147-NKL

**PLAINTIFFS’ UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, AWARD OF ATTORNEY COSTS AND EXPENSES, AND
APPROVAL OF REPRESENTATIVE PLAINTIFFS’ INCENTIVE AWARDS**

COME NOW Plaintiffs, Jean Heckmann, Eric LaFollette, and Camille LaFollette, individually and on behalf of others similarly situated, by and through their counsel of record, and pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) respectfully move the Court to: (1) grant final approval of the class action Settlement and enter the proposed Final Order and Judgment;¹ (2) certify the settlement Class for settlement purposes, (3) approve incentive awards to the Representative Plaintiffs in the amounts set forth in Plaintiffs’ Suggestions being filed herewith; (4) award Class Counsel \$240,000 in reimbursement for incurred litigation costs and expenses; (5) appoint Jean Heckmann, Eric LaFollette, and Camille LaFollette as class

¹ Prior to the Fairness Hearing, the parties will submit a proposed Final Order and Judgment to the Court which will be identical to the draft previously submitted as part of the preliminary approval filings [Doc. 288-1 at p. 51] except for changes to reflect the circumstances at the time of the Hearing and to fill-in information that was previously left blank.

representatives, and (6) appoint Derrick Morton, Douglas Terry, David Steelman and Thomas Hearne as Class Counsel.

The grounds for Plaintiffs' Motion are set forth in the accompanying Suggestions in Support of Plaintiffs' Unopposed Motion for Approval of Class Action Settlement, Award of Attorney Costs and Expenses, and Approval of Representative Plaintiffs' Incentive Awards.

Respectfully Submitted,

NELSON, TERRY, MORTON
DEWITT & PARUOLO

By: /s/ Derrick L. Morton
Derrick L. Morton
(*admitted pro hac vice*)
Oklahoma Bar No. 17934
Douglas A. Terry
(*admitted pro hac vice*)
Oklahoma Bar No. 15855
P.O. Box 138800
Oklahoma City, Oklahoma 73113
Telephone: (405) 705-3600
Facsimile: (405) 705-2573
dterry@ntmdlaw.com
morton@ntmdlaw.com

-and-

STEELMAN, GAUNT & HORSEFIELD
David L. Steelman #27334
901 Pine Street, Suite 110
P.O. Box 1257
Rolla, Missouri 65402
Telephone: (573) 341-8336
Facsimile: (573) 341-8548
dsteelman@steelmanandgaunt.com

-and-

HEARNE & PIVAC
Thomas H. Hearne #27596
2733 E. Battlefield, No. 301
Springfield, Missouri 65804
Telephone (417) 883-3399
Facsimile: (417) 883-3996
thearne@hplawfirm.org

CERTIFICATE OF SERVICE

I hereby certify that on this date, July 27, 2018, the foregoing was served on the following through the Court's ECF system:

Bruce A. Moothart
Michael L. Blumenthal
Deena B. Jenab
SEYFERTH BLUMENTHAL & HARRIS LLC
4801 Main Street, Suite 310
Kansas City, Missouri 64112
Telephone: (816) 756-0700
Facsimile: (816) 756-3700
bruce@sbhlaw.com
mike@sbhlaw.com
deena@sbhlaw.com

Attorneys for Defendant

/s/ Derrick L. Morton
Derrick L. Morton