

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

**JARED KRUGER, MARK VAN
ESSEN, LYNN KIRSCHBAUM,
DONNA and ROBERT KOON, and
SCHUMACHER DAIRY FARMS OF
PLAINVIEW LLC**, on behalf of
themselves and all others similarly
situated,

v.

LELY NORTH AMERICA, INC.

Case No. 0:20-cv-00629-KMM/DTS

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL AND
TO DIRECT NOTICE OF PROPOSED SETTLEMENT TO THE CLASS**

Plaintiffs Jared Kruger, Mark Van Essen, Lynn Kirschbaum, Donna and Robert Koon, and Schumacher Dairy Farms of Plainview LLC, on behalf of themselves and all others similarly situated, move for entry of an order preliminarily approving the proposed settlement, directing notice of the proposed class action settlement in the above-captioned litigation, the scheduling of a hearing to consider final approval of the settlement. Defendants do not oppose this motion.

In support of their motion, Plaintiffs submit a memorandum of law and the Declaration of Patrick J. Stueve and its supporting exhibits, which include the Settlement Agreement. For the reasons set forth in their memorandum and accompanying papers, Plaintiffs respectfully request that the Court enter the proposed order submitted herewith. The capitalized terms in this motion and the accompanying memorandum have the meaning set forth in the Settlement Agreement.

Dated: November 21, 2022

Respectfully submitted,

/s/ Patrick J. Stueve

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