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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
C.A. NO.1684-CV-03611-BLS2

MATTHEW PERLOW, on behalf of himself
and others similarly situated,

Plaintiff,

v.

ABC FINANCIAL SERVICES, INC. and
SEAS & ASSOCIATES, LLC,

Defendants.

Notice sent

3/13/2019

E. F. H.

S., H. & U., LLP.

A. M. S.

M. H. B.

A. N. D.

P. & A.

C. M. S.

(sc)

2019 MAR 11 P 2:35
SUPERIOR COURT

**PLAINTIFF'S UNOPPOSED MOTION TO APPROVE PLAN OF ALLOCATION AND
AUTHORIZE DISTRIBUTION OF THE NET SETTLEMENT AMOUNT**

Plaintiff Matthew Perlow respectfully moves the Court, individually and on behalf of the Settlement Class, to (1) approve reservation of funds from the Settlement Fund to pay the Settlement Administrator for the costs and expenses of the settlement administration as described below, (2) approve the allocation of the Net Settlement Amount in the manner described below, (3) authorize distribution of the Net Settlement Amount to the Settlement Class in the manner described below, and (4) authorize the distribution of any residual funds to be paid equally between the Massachusetts IOLTA Committee and the National Consumer Law Center. In support of this motion, Plaintiff submits herewith the Declaration of Adam M. Stewart ("Stewart Declaration").

As grounds for this motion, Plaintiff states as follows:

1) On December 19, 2018, this Court entered the Final Order and Judgment in this action that, among other things, approved the Stipulation and Settlement Agreement (the "Settlement") as fair, reasonable, adequate and in the best interest of the Settlement Class. Paper No.

26.

Allowed
13 March 2019