

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: CAPITAL ONE CONSUMER) MDL No. 1:19md2915 (AJT/JFA)
DATA SECURITY BREACH LITIGATION)
_____)

This Document Relates to the Consumer Cases

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

Plaintiffs move for entry of an order directing notice of the proposed class action settlement of the consumer cases and scheduling a hearing to consider final approval of the settlement. Plaintiffs are simultaneously filing a supporting memorandum of law and its supporting exhibits, which include the Settlement Agreement. For the reasons set forth in that memorandum, Plaintiffs respectfully request that the Court enter the proposed order submitted as Exhibit 3 to the Memorandum in Support of this Motion filed herewith. For ease of reference, the capitalized terms in this motion and the accompanying memorandum have the meaning set forth in the Settlement Agreement.

Dated: January 31, 2022

Respectfully Submitted,

/s/ Steven T. Webster

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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

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