

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION
(Electronically Filed)**

MILDRED BALDWIN and	:	
DOUGLAS DYRSSEN SR.,	:	
On Behalf of Themselves and All Others	:	
Similarly Situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No, 2:21-cv-04066-WJE
	:	
NATIONAL WESTERN LIFE INSURANCE	:	
COMPANY,	:	
	:	
Defendant.	:	
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**PLAINTIFFS’ UNOPPOSED MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiffs Mildred Baldwin and Douglas Dyrssen, Sr., individually and behalf of others similarly situated (“Plaintiffs”) hereby move this Court for final approval of the class action settlement preliminarily approved by this Court on January 19, 2022. Plaintiffs respectfully request that this Court:

- a. Grant final certification of the Settlement Classes, appoint Plaintiffs Mildred Baldwin and Douglas Dyrssen as Class Representatives and appoint David Lietz and J. Gerard Stranch IV as Class Counsel;
- b. Approve the requested attorneys’ fees and costs in the amount of \$1,314,900 and Plaintiffs’ requested service awards in the amount of \$3,000 to each of the two named Plaintiffs;
- c. Find that the Notice met the requirements of due process and Federal Rule of Civil Procedure 23;

d. Find that the terms of the Settlement Agreement fair, reasonable, and adequate and approved, adopted, and incorporated by the Court;

e. Direct the Parties, their respective attorneys, and the Claims Administrator to consummate the Settlement in accordance with the Court Order and the terms of the Settlement Agreement.

f. Resolve all claims against all parties in this Action and issue the Proposed Final Approval Order previously filed as Exhibit F to ECF 61-1 (and resubmitted in Word format to the Court via email).

This Motion is based on: the Supporting Suggestions filed herewith; the Settlement Administrator Declaration of Postlethwaite & Netterville, APAC (“P&N”) in Support of Final Approval filed herewith; the Declaration of David K. Lietz in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement filed herewith; the Settlement Agreement entered into between the parties as well as the Notices issued to the Class at ECF 61-1; Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, Supporting Suggestions, and Supporting Declaration at ECF 60, 61, and 61-1; and Plaintiffs’ Motion for Approval of Attorneys’ Fees, Costs, and Service Awards and accompanying documents at ECF 69 and 70; all other pleadings and papers on file in this action; and any oral argument that may be heard by this Court at or prior to the Final Approval Hearing currently scheduled for June 16, 2022.

Defendant does not oppose the relief sought in this motion.

Wherefore, premises considered, Plaintiffs request that this Court grant this motion.

Dated April 6, 2022

Respectfully submitted,

/s/David K. Lietz

David K. Lietz (admitted *pro hac vice*)
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Attorneys for Plaintiffs and Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing by electronic mail to the attorneys and parties of record.

/s/David K. Lietz
David K. Lietz