

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PHILIP FRYMAN, et al.,

Plaintiffs,

v.

ATLAS FINANCIAL HOLDINGS, INC.,  
SCOTT D. WOLLNEY, and PAUL A.  
ROMANO,

Defendants.

Case No. 1:18-cv-01640

Hon. Franklin U. Valderrama  
United States District Judge

Hon. Sheila M. Finnegan  
United States Magistrate Judge

**Telephonic Hearing Date: September 6, 2023**  
**Time: 10:00 a.m.**

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

Court-appointed Lead Plaintiffs Philip Fryman and Aram Hovasapyan and additional-named plaintiff Ji Chuan (collectively, “Plaintiffs”) hereby respectfully move the Court for an Order: (i) granting final approval of the Settlement<sup>1</sup> in the above-captioned action; and (ii) approving the proposed Plan of Allocation for distribution of the Settlement Fund. Defendants do not oppose the relief requested by this Motion.

The grounds in support of this Motion are set forth fully in the concurrently-filed Memorandum of Law in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and the Declaration of Kara M. Wolke in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses, and the exhibits attached thereto.

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated November 28, 2022 (ECF No. 141-1).

Dated: August 2, 2023

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered ECF participants.

s/ Kara M. Wolke  
Kara M. Wolke