

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

MINERVA MARTINEZ, SANDRA SCOTT,  
CARL GRAHAM, ANNE PARYS, DAVID  
ORTIZ, SEAN CHAMBERS AND  
TIFFANY JAMES, individually, and on  
behalf of a class of similarly situated  
individuals,

Plaintiffs,

v.

NISSAN NORTH AMERICA INC., a  
Delaware corporation,

Defendant.

**Case No.: 3:22-cv-00354**

District Judge Eli J. Richardson

Date: March 20, 2023

Time: 1:00 p.m.

Courtroom: 5C

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF THE CLASS ACTION  
SETTLEMENT WITH DEFENDANT NISSAN NORTH AMERICA, INC.**

Plaintiffs,<sup>1</sup> individually, and on behalf of a settlement class of similarly situated individuals, hereby move for final approval of the Settlement Agreement (ECF No. 22-2) with Defendant Nissan North America, Inc. This Motion is based on the accompanying Memorandum of Points and Authorities, the accompanying Motion for Attorneys' Fees, Costs, and Class Representative Service Awards, and the Declarations and exhibits thereto, as well as any briefs filed in support, and the papers, records, and pleadings on file herein.

Dated: January 12, 2023

Respectfully submitted,

/s/ Gregory F. Coleman

Gregory F. Coleman

---

<sup>1</sup> "Plaintiffs" collectively refers to Minerva Martinez, Sandra Scott, Carl Graham, Anne Parys and David Ortiz ("Altima Plaintiffs"), and Sean Chambers and Tiffany James ("Sentra-Versa Plaintiffs").

**MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, PLLC**  
800 South Gay Street Suite 1100  
Knoxville, TN 37929  
T: 865-247-0080  
F: 865-522-0049  
gcoleman@milberg.com

Melissa S. Weiner (*pro hac vice*)  
**PEARSON WARSHAW, LLP**  
328 Barry Avenue South, Suite 200  
Wayzata, MN 55391  
T: 612-389-0600  
F: 612- 389-0610  
mweiner@pwfirm.com

Tarek H. Zohdy (*pro hac vice*)  
Cody R. Padgett (*pro hac vice*)  
Laura E. Goolsby (*pro hac vice*)  
**CAPSTONE LAW APC**  
1875 Century Park East, Suite 1000  
Los Angeles, CA 90067  
T: 310-556-4811  
F: 310- 943-0396  
Tarek.Zohdy@capstonelawyers.com  
Cody.Padgett@capstonelawyers.com  
Laura.Goolsby@capstonelawyers.com

Norberto J. Cisneros, Esq. (*pro hac vice*)  
Barbara McDonald, Esq.  
**MADDOX & CISNEROS, LLP**  
3230 S. Buffalo Drive, Suite 108  
Las Vegas, NV 89117  
T: 702-366-1900  
F: 702-366-1999  
ncisneros@mic-law.com

James C. Shah (*pro hac vice*)  
Natalie Finkelman Bennett (*pro hac vice*)  
**MILLER SHAH LLP**  
1845 Walnut Street, Suite 806  
Philadelphia, PA 19103  
T: 866-540-5505  
F: 866-300-7367  
jcshah@millershah.com  
nfinkelman@millershah.com

Lawrence Deutsch (*pro hac vice*)  
**BERGER MONTAGUE PC**  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
T: 215-875-3062  
F: 215- 875-4604  
ldeutsch@bm.net

*Attorneys for Plaintiffs and the Class*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he caused a copy of the foregoing to be served upon the following counsel of record by the Court's ECF system, this PLAINTIFFS' MOTION FOR FINAL APPROVAL OF THE CLASS ACTION SETTLEMENT WITH DEFENDANT NISSAN NORTH AMERICA, INC., on the 12th day of January, 2023.

John S. Hicks  
**BAKER DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.**  
211 Commerce Street, Suite 800  
Nashville, Tennessee 37201  
jhicks@bakerdonelson.com

E. Paul Cauley, Jr.  
S. Vance Wittie  
**FAEGRE DRINKER BIDDLE &  
REATH LLP**  
1717 Main Street, Suite 5400  
Dallas, Texas 75201  
paul.cauley@faegredrinker.com  
vance.wittie@faegredrinker.com

Bradley J. Andreozzi  
320 S. Canal Street, Suite 3300  
Chicago, Illinois 60606  
bradley.andreozzi@faegredrinker.com

*Attorneys for Defendant Nissan North America, Inc.*

/s/ Gregory F. Coleman \_\_\_\_\_  
Gregory F. Coleman