

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF ARKANSAS
NORTHERN DIVISION**

ERIK KNIGHT and JUNG KIM,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PROGRESSIVE NORTHWESTERN
INSURANCE COMPANY, PROGRESSIVE
DIRECT INSURANCE COMPANY,
PROGRESSIVE CASUALTY INSURANCE
COMPANY, PROGRESSIVE SPECIALTY
INSURANCE, and PROGRESSIVE
CLASSIC INSURANCE COMPANY, Ohio
corporations,

Defendants.

Case No.: 3:22-cv-00203-JM

**PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

In accord with the Settlement Agreement (the “Settlement Agreement”)¹ and this Court’s Order Granting Preliminary Approval, dated May 19, 2025 (ECF No. 184, the “Preliminary Approval Order”), Plaintiffs Erik Knight and Jung Kim (“Plaintiffs” or “Settlement Class Representatives”), by and through undersigned counsel, hereby move this Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an order (i) granting final approval of the proposed settlement of this case (the “Settlement”) as fair, reasonable, and adequate; (ii) granting final certification to the Settlement Classes; and (iii) finding the notice program as set forth in the

¹ Previously filed with the Court on May 8, 2025 as Exhibit 1 to the Declaration of Hank Bates in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement. See ECF No. 179-1.

Settlement Agreement and effectuated pursuant to the Preliminary Approval Order satisfies the requirements of Federal Rule of Civil Procedure 23(c) and due process and constitutes the best notice practicable under the circumstances. In support thereof, Plaintiffs are contemporaneously filing a Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and the declarations of Hank Bates and Cameron Azari.

Dated: August 1, 2025

Respectfully submitted,

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