

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

1. LAURA DOUGHTY and 2. AMANDA  
FISCHER, individually and on behalf of all  
similarly situated persons,

Plaintiffs,

v.

1. CENTRALSQUARE TECHNOLOGIES, LLC  
and

2. CITY OF NORMAN, OKLAHOMA, a  
municipal corporation,

Defendants.

Case No. 5:20-cv-00500-G

Hon. Charles B. Goodwin

**PLAINTIFFS' AND DEFENDANT, CENTRALSQUARE TECHNOLOGIES,  
LLC'S JOINT MOTION TO AMEND DEADLINES SET FORTH IN  
ORDER ENTERED JUNE 16, 2022 (ECF NO. 121)**

COME NOW the Parties, by and through their respective counsel of record, and hereby request the Court amend the deadlines set forth in its June 16, 2022 Order (ECF No. 121) amending the deadlines originally set in the Order Granting Preliminary Approval of Plaintiffs' class action settlement with Defendant, CentralSquare Technologies, LLC ("CentralSquare") (ECF No. 115). In support of this motion, the Parties show the Court as follows:

1. This Court entered its Order granting preliminary approval on April 20, 2022 (ECF No. 115);
2. The Order provided deadlines by which the settlement should be administered;

3. On June 6, 2022, the Parties filed a joint motion to amend the deadlines set forth in the Order Granting Preliminary Approval (ECF No. 119) in order to allow the Settlement Administrator to complete the notice program;
4. Since the Court entered the Order amending the deadlines (ECF No. 121), the Parties have continued to identify additional Settlement Class members and intend to provide notice by additional means, including by publication in the affected municipalities as well as a digital notice plan utilizing Internet banner ads to target affected municipalities;
5. In order to allow for additional Settlement Class members to receive notice and give them opportunity to file a claim, the Parties now seek an additional extension of the settlement deadlines;
6. Therefore, the Parties respectfully request that the deadlines set forth in the Order be extended as follows, and Plaintiffs seek leave to file a joint supplement to their Motion for Final Approval (ECF No. 122) and Motion for Attorneys' Fees, Expenses, and Service Awards to Class Representatives (ECF No. 123):
  - Objection and Opt-Out Deadline: September 8, 2022
  - Claims Deadline: October 24, 2022
  - Deadline to file a Joint Supplement to Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards and Motion for Final Approval of the Settlement in order to apprise the Court of the additional notice program and updated claims rate: August 28, 2022

- Objectors' Response to Supplement to Final Approval Motion and Fee Application: September 12, 2022
  - Replies in Support of Supplement to Final Approval and Fee Motion: September 27, 2022
  - Final Approval Hearing: \_\_\_\_\_, 2022
7. This will be the second extension of the deadlines set forth in the Order;
  8. The impact on the upcoming deadlines is set forth in paragraph 6, *supra*; and
  9. The Parties' request will affect the date of the Final Approval Hearing, currently set for October 7, 2022 at 2:00 pm CT.

**RELIEF REQUESTED**

The Parties respectfully request this Court extend the deadlines set forth in its June 16, 2022 Order (ECF No. 121).

Dated: July 27, 2022

Respectfully submitted,

*s/William B. Federman*

William B. Federman, OBA #2853

Molly E. Brantley, OBA #33126

**Federman & Sherwood**

10205 N. Pennsylvania Ave.

Oklahoma City, OK 73120

T: (405) 235-1560

F: (405) 239-2112

[wbf@federmanlaw.com](mailto:wbf@federmanlaw.com)

[meb@federmanlaw.com](mailto:meb@federmanlaw.com)

*Counsel for Plaintiffs and the Putative Classes*

*s/Jeffrey R. Gans*

Jeffrey R. Gans, VA SBN 39094\*

Pillsbury Winthrop Shaw Pittman LLP

1200 17<sup>th</sup> St. NW  
Washington, D.C. 20036  
T: (202) 663-9387  
F: (202) 663-8007  
[Jeffrey.Gans@Pillsburylaw.com](mailto:Jeffrey.Gans@Pillsburylaw.com)

*Attorneys for Defendant  
CentralSquare Technologies, LLC*

*\*admitted pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of July, 2022, a copy of the foregoing pleading was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system to all counsel of record.

*/s/ William B. Federman*