

FILED

12/19/2024 10:35 AM

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 19TH JUDICIAL DISTRICT
COUNTY OF LAKE**

**Erin Cartwright Weinstein
Clerk of the Court
Lake County, Illinois**

EMILIE HAYEK, ANURAAG KHANDL
WAL, and SAMANTHA CUTRONA, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

ALO, LLC, a California limited liability
company, d/b/a ALO MOVES,

Defendant.

Case No. 2024LA00000193

**[PROPOSED] FINAL JUDGMENT AND ORDER GRANTING
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Before the Court is Plaintiffs' Motion requesting that the Court enter an Order granting final approval of the class action Settlement involving Plaintiffs, individually and on behalf of the Settlement Class, and Defendant Alo, LLC d/b/a Alo Moves ("Defendant") as fair, reasonable and adequate.

Having reviewed and considered the Settlement Agreement and the motion for final approval of the Settlement, and having conducted a Final Approval Hearing, the Court makes the following findings and grants the relief set forth below approving the Settlement upon the terms and conditions set forth in this Final Order and Judgment.

IT IS ON THIS ____th day of ____, 202__,

ORDERED that:

1. The Settlement does not constitute an admission of liability by Defendants, and the Court expressly does not make any finding of liability or wrongdoing by Defendants.

2. Unless otherwise noted, words spelled in this Order with initial capital letters have the same meaning as set forth in the Settlement Agreement.

3. This Court previously issued an Order which among other things: (a) approved the Notice to the Settlement Class, including approval of the form and manner of notice under the Notice Program set forth in the Settlement Agreement; (b) provisionally certified a Settlement Class in this matter, including defining the class, appointed Plaintiffs as the Settlement Class Representatives, and appointed Settlement Class Counsel; (c) preliminarily approved the Settlement; (d) set deadlines for opt-outs and objections; (e) approved and appointed the Claims Administrator and (f) set the date for the Final Approval Hearing.

4. In the Order Granting the Motion for Preliminary Approval of Class Action Settlement, for settlement purposes only, the Court certified the Settlement Class, defined as follows:

All Persons in the United States who, from October 20, 2021 to the Present, watched one or more videos on Alo Moves, and whose Video Viewing Information was disclosed to Meta via the Meta Pixel.

5. The Court, having reviewed the terms of the Settlement Agreement submitted by the Parties, grants final approval of the Settlement Agreement and finds that the Settlement is fair, reasonable and adequate and meets the requirements of 735 ILCS 5/2-801 for settlement purposes.

6. Settlement Class Counsel applied for an award of attorney's fees and reimbursement of litigation costs in the amount of \$625,000.00. Given all of the facts and circumstances, the Court finds this amount to be fair, reasonable, and adequate and approves the requested award of attorney's fees.

7. The Settlement Agreement provides for a class representative service award of \$2,000.00 to each of the three named Plaintiffs (\$6,000.00 in total). The Court finds that this modest award is reasonable and hereby grants approval.

8. Notice of the Final Approval Hearing, the proposed motion for attorneys' fees, costs and expenses, and the proposed Service Award payment to Plaintiffs has been provided to Settlement Class Members as directed by this Court's Orders.

9. The Court finds that the Notice issued to the Class constitutes the best possible notice practicable under the circumstances and constitutes valid, due and sufficient notice to all Settlement Class Members.

10. As of the final date of the Opt-Out Period, one potential Settlement Class Member have submitted a valid Opt-Out Request to be excluded from the Settlement. The name of that person is set forth in Exhibit A (the "Exclusion List"). This person is not bound by this Final Order and Judgment, as set forth in the Settlement Agreement.

11. The Court has considered all the documents filed in support of the Settlement, and has fully considered all matters raised, all exhibits and affidavits filed, all evidence received at the Final Approval Hearing, all other papers and documents comprising the record herein, and all oral arguments presented to the Court.

12. Further to the Settlement Agreement, Plaintiff and the Settlement Class Members release claims against Defendant and all Released Persons, as defined in the Settlement Agreement. The released claims shall not include the right of any Settlement Class Member or any

of the Released Persons to enforce the terms of the Settlement contained in this Settlement Agreement and shall not include the claims of those persons identified in the Exclusion List who have timely and validly requested exclusion from the Settlement Class.

13. On the Effective Date and in consideration of the promises and covenants set forth in this Settlement Agreement, the Releasing Parties and Settlement Class Counsel and each of their past and present law firms, partners, or other employers, employees, agents, representatives, successors, or assigns will be deemed to have, and by operation of this Final Order and Judgment, shall have, fully, finally, completely and forever released and discharged Defendants and the Released Persons from the released claims, as set forth in the Settlement Agreement.

14. The matter is hereby dismissed with prejudice and without costs except that the Court reserves jurisdiction over the consummation and enforcement of the Settlement.

15. This Final Order and Judgment resolves all claims against all Parties in this Litigation and is a final order.

16. There is no just reason to delay the entry of final judgment in this matter, and the Clerk is directed to file this Order as the final judgment in this matter.

Dated: _____


HON. CHARLES SMITH
CIRCUIT JUDGE

EXHIBIT A

The following Settlement Class Member has submitted a valid Opt-Out Request to be excluded from the Settlement and is not bound by this Final Order and Judgment, as set forth in the Settlement Agreement:

1. Felicia Freitas