

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

MYA BATTON, AARON BOLTON,
MICHAEL BRACE, DO YEON IRENE KIM,
ANNA JAMES, JAMES MULLIS,
THEODORE BISBICOS, and DANIEL
PARSONS, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF
REALTORS, ANYWHERE REAL ESTATE, INC.
FORMERLY KNOWN AS REALOGY HOLDINGS
CORP., RE/MAX LLC, and KELLER WILLIAMS
REALTY, INC.,

Defendants.

Case No. 1:21-cv-00430 (LAH)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on February 11, 2026, at 10:00 a.m., or as soon thereafter as they may be heard, Plaintiffs Mya Batton, Aaron Bolton, Michael Brace, Do Yeon Irene Kim, Anna James, James Mullis, Theodore Bisbicos, and Daniel Parsons (“Plaintiffs”), through their counsel, shall appear before the Honorable Judge Hunt or any judge sitting in her stead in Courtroom 1425 of the U.S. District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois 60604, and shall present the following motion: **Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement with Keller Williams Realty, LLC and Plaintiffs’ Memorandum of Law** in support thereof.

As detailed in their Memorandum of Law and accompanying documents, Plaintiffs respectfully submit that the proposed Settlement is fair, reasonable, and adequate such that the Court will likely be able to approve the Settlement under Fed R. Civ. P. 23 (e)(2). Plaintiffs further submit that the settlement satisfies the requirements of Fed R. Civ. P. 23(a) and 23(b)(3) and that proposed class counsel are adequate under Fed. R. Civ. P. 23(g). Plaintiffs therefore respectfully move for entry of an order:

- (i) preliminarily approving the settlement;
- (ii) certifying a settlement class as to Defendant Keller Williams Realty, LLC;
- (iii) appointing Lowey Dannenberg, P.C. and Korein Tillery, LLC as Settlement Class Counsel;
- (iv) approving the proposed plan of notice to settlement class members;
- (v) appointing A.B. Data, Ltd. as Claims Administrator;
- (vi) appointing Citibank, N.A. as Escrow Agent; and
- (vii) setting deadlines related to final approval of the settlement.

Dated: February 2, 2026

Respectfully submitted,

/s/ Vincent Briganti

Vincent Briganti (pro hac vice)

Margaret MacLean (pro hac vice)

Noelle Forde (pro hac vice)

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Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2026, a true and correct copy of the foregoing was filed electronically through the Court's CM/ECF system, which will send notification of the same to all counsel of record in this matter.

/s/ Noelle Forde
Noelle Forde