

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARK BUTTERLINE, in his own right and  
as personal representative of the estate of Lisa  
Butterline, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CITY OF PHILADELPHIA,

Defendant.

Case No.: 2:15-cv-01429-JS

**JOINT MOTION FOR PRELIMINARY APPROVAL OF  
SETTLEMENT AND PROVISIONAL CLASS CERTIFICATION**

Plaintiff Mark Butterline, in his own right and as personal representative of the estate of Lisa Butterline, individually and on behalf of all others similarly situated, through counsel of record (“Class Counsel”), and Defendant City of Philadelphia, through counsel of record (“Defense Counsel”) respectfully submit this Joint Motion for Preliminary Approval of Settlement and Provisional Settlement Class Certification. For the reasons stated in the accompanying Memorandum of Law, the Parties move this Honorable Court to enter an Order: (1) granting preliminary approval of the proposed settlement of this action memorialized in the Settlement Agreement (“Settlement Agreement”); (2) ordering the

dissemination of notice; and (3) scheduling a final fairness hearing.

Dated: April 20, 2022

Respectfully submitted,

/s/ Daniel C. Levin

/s/ Amy Kirby

Daniel C. Levin, Esquire  
**LEVIN SEDRAN & BERMAN**  
510 Walnut Street, Ste. 500  
Philadelphia, PA 19106  
(215) 592-1500

Amy Kirby, Esquire  
Senior Attorney  
Michael Pfautz, Esquire  
Deputy City Solicitor  
City of Philadelphia Law Department  
1515 Arch Street 15<sup>th</sup> Floor  
Philadelphia, PA 19102

William Wilson, Esquire  
**THE LAW OFFICES OF WILLIAM  
WILSON**  
20 West Miner Street  
West Chester, PA 19382  
(484) 605-1146

*Attorneys for Defendant*

Michael G. Louis, Esquire  
**MACELREE HARVEY, LTD.**  
17 West Miner Street  
West Chester, PA 19382  
(610) 840-0228

*Attorneys for Plaintiff and the Proposed  
Settlement Class*