

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

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**In re SunTrust Banks, Inc. 401(k) Plan  
Affiliated Funds ERISA Litigation**

**CIVIL ACTION FILE NO.  
1:11-CV-784-ODE**

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**PLAINTIFFS' UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT, APPROVAL OF FORM AND MANNER OF  
CLASS NOTICE AND SCHEDULING OF FAIRNESS HEARING**

Plaintiffs Barbara Fuller, Elaine Jefferson, Barbara Kennedy, Selethia Pruitt, and Mariah Williams (“Class Representatives”), who are participants in the SunTrust Banks, Inc. 401(k) Savings Plan (“Plan”), respectfully move the Court for an Order: (1) preliminarily approving the Parties’ proposed Class Action Settlement (“Settlement” or “Settlement Agreement”); (2) approving the form and method of providing notice of the Settlement (the “Notice Plan”); and (3) setting a date and time for a hearing (the “Fairness Hearing”) for consideration of final approval of the Settlement, of payment of attorneys’ fees and expenses, and of potential Incentive Awards to the Class Representatives. Plaintiffs’ memorandum of law in support of this unopposed motion is filed herewith. The Settlement Agreement is attached as Exhibit 1 to this Motion. Attached as exhibits to the Settlement Agreement are a proposed Plan of Allocation (Exhibit A), proposed Preliminary Approval Order

(Exhibit B), proposed Class Notice (Exhibit C), and a proposed Final Approval Order and Judgment (Exhibit D).

For the reasons set forth in the accompanying memorandum of law, Plaintiffs submit that the proposed Settlement is fair, reasonable and adequate. Additionally, the proposed Notice Plan satisfies the requirements of due process and is consistent with that used in analogous actions. Accordingly, Plaintiffs respectfully request that the proposed Settlement be preliminarily approved, the Notice Plan be approved, and a Fairness Hearing be scheduled.

Dated: March 11, 2020

Respectfully submitted,

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*Local & Liaison Counsel for Plaintiffs  
and the Class*

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1C. This Motion was prepared on a computer using the Times New Roman font (14 point).

Date: March 11, 2020

/s/ James A. Moore