

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION**

KAREN MCNEIL, *et al.*,

Plaintiffs,

v.

COMMUNITY PROBATION SERVICES,  
LLC; *et al.*,

Defendants.

Case No. 1:18-cv-00033

Judge Campbell/Magistrate Judge Frensley

JURY DEMAND

**PLAINTIFFS AND COUNTY DEFENDANTS' JOINT MOTION  
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Karen McNeil, Lesley Johnson, Indya Hilfort, Lucinda Brandon, the Estate of Tanya Mitchell, and Victor Gray (collectively, “Named Plaintiffs”), along with Defendants Giles County and Giles County Sheriff Kyle Helton in his official capacity (collectively, “County Defendants”), respectfully submit this Joint Motion for Preliminary Approval of a Class Action Settlement and Consent Decree between Named Plaintiffs and County Defendants. PSI Defendants and CPS Defendants are not party to the Settlement Agreement or Consent Decree and do not join in this motion.

In sum, the Settlement Agreement and Consent Decree will finally resolve all claims against all Defendants in this case,<sup>1</sup> end private probation in Giles County, and result in the payment of \$2 million in damages to Class Members and Named Plaintiffs and attorneys’ fees. As

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<sup>1</sup> As part of the Settlement Agreement with County Defendants, Named Plaintiffs have agreed to dismiss with prejudice their claims against the PSI Defendants and CPS Defendants if the Court approves the Settlement Agreement and Consent Decree.

discussed more fully in the Memorandum in Support, this settlement should be approved because it is “fair, reasonable and adequate.” Fed. R. Civ. P. 23(e)(1)-(2). Named Plaintiffs and County Defendants respectfully ask the Court to preliminary certify the class, grant preliminary approval to initiate the claims process, and set a final in-person Fairness Hearing.

Dated: June 30, 2021

Respectfully Submitted,

/s/ Elizabeth Rossi

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**CERTIFICATE OF SERVICE**

I certify that on June 30, 2021, I electronically filed the foregoing Plaintiffs' and County Defendants' Joint Motion for Preliminary Approval of a Class Action Settlement and Consent Decree using the CM-ECF System, which caused notice to be sent to via email to the following counsel of record:

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/s/ Elizabeth Rossi