

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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WILLIAM DIXON, <i>et al.</i>)	
	Plaintiffs,)	
)	Civil Action No. 1:74-cv-00285 (TFH)
	v.)	
)	
VINCENT C. GRAY, <i>et al.</i>)	
Defendants.)	
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**JOINT MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiffs and Defendants (collectively the “Parties”) jointly and respectfully move this Court, pursuant to Federal Rule of Civil Procedure 23(e), for preliminary approval of a proposed class action settlement, the terms of which are set forth in a Settlement Agreement dated September 8, 2011 (the “Settlement Agreement”).

The Parties hereby request that an Order in substantially the form of the [Proposed] Order Preliminarily Approving Class Action Settlement, Approving Notice Plan, And Setting Of Fairness Hearing, attached as Exhibit 2 to the Settlement Agreement, be entered by the Court preliminarily approving the Settlement.

In support of this Motion, Plaintiffs have filed contemporaneously herewith a Memorandum In Support Of The Parties’ Joint Motion For Preliminary Approval Of Class Action Settlement, to which the Settlement Agreement is attached as Exhibit A.

Respectfully submitted,

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Dated: September 8, 2011