

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE: BESTWAY ABOVE-GROUND
POOLS LITIGATION

Case No.: 1:25-cv-09570

**PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT,
PRELIMINARY CERTIFICATION OF
SETTLEMENT CLASS, AND
APPROVAL OF NOTICE PLAN**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Susana Castro, Jamie DeSabio, Shannon Gannon, Katrina Hill, Leah Holloway, Pete Piceno, and Lisa Weeks ("Plaintiffs"), on behalf of themselves and the proposed Settlement Class, move for entry of an order: (1) preliminarily approving the Settlement; (2) certifying the Settlement Class for settlement purposes only; (3) approving the Notice Plan, including the opt-out and objection procedures; (4) approving the claims process; (5) appointing Kevin Laukaitis of Laukaitis Law LLC and Rachel Soffin of Pearson Warshaw, LLP as Co-Lead Class Counsel, and confirming the Executive Committee as Class Counsel; (6) appointing EisnerAmper LLP as the Settlement Administrator; and (7) entering the proposed Preliminary Approval Order submitted with the Settlement Agreement.

This motion is based on the accompanying memorandum of law, the Settlement Agreement and its exhibits, Class Counsel's Omnibus Declaration, and all prior pleadings and proceedings herein. Defendants do not oppose this motion.

Date: April 30, 2026

Respectfully submitted,

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Plaintiffs' Executive Committee

CERTIFICATE OF SERVICE

I, Kevin Laukaitis, certify that on April 30, 2026, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Kevin Laukaitis
Kevin Laukaitis