

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

MICHAEL DRAKE, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

THE PROCTER & GAMBLE COMPANY,

Defendant.

Case No. 3:21-cv-00279-DWD

JOINT NOTICE OF SETTLEMENT OF CLAIM

Now Comes Defendant, THE PROCTER & GAMBLE COMPANY, by RYNEARSON, SUESS, SCHNURBUSCH, & CHAMPION, LLC and KING & SPALDING LLP, its attorneys; and Plaintiff, MICHAEL DRAKE, Individually, and on behalf of all others similarly situated, by GOLDENBERG HELLER & ANTOGNOLI, P.C., their attorneys; and for their Joint Notice of Settlement of Claim, inform this Court as follows:

1. A settlement of this action has been reached.
2. The parties are in the process of consummating the settlement.

WHEREFORE, The Procter & Gamble Company and Michael Drake respectfully request this Court to enter an Order directing the Clerk of the Court to cancel any settings currently pending, and enter judgment of a dismissal with prejudice of the above entitled action in 90 days providing, however, that if the parties are unable to fully consummate the settlement within that 90 day period, they may petition the Court to delay entry of judgment until a later date.

Dated: February 23, 2022

Respectfully submitted,

/s/Kevin P. Green (with consent)
Mark C. Goldenberg (0990221)
Thomas P. Rosenfeld (06301406)
Kevin P. Green (0699905)
GOLDENBERG HELLER & ANTOGNOLI P.C.
2227 South State Route 157
Edwardsville, IL 62025
618-656-5150
mark@ghalaw.com
tom@ghalaw.com
kevin@ghalaw.com
Attorneys for Plaintiff

/s/David A. Schott
David A. Schott (6288583)
dschott@rssclaw.com
Scott D. Bjorseth (6203776)
sbjorseth@rssclaw.com
RYNEARSON, SUESS, SCHNURBUSCH &
CHAMPION, LLC
107 Southpointe Drive
Edwardsville, IL 62025
Telephone: (618) 659-0588
*Attorneys for Defendant The Procter & Gamble
Company*

CERTIFICATE OF SERVICE

The undersigned attorney certifies that a copy of the foregoing document was served upon all attorneys of record via the Court's electronic filing system on this 23rd day of February, 2022.

/s/David A. Schott