

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

XXX

PLAINTIFFS

v

XXX

DEFENDANTS

Case: XXX

JUDGE:

Next Event:

Date:

**JOINT MOTION FOR APPROVAL
OF SETTLEMENT AGREEMENT AND RELEASE**

Plaintiffs XXX, and XXX (Defendants), respectfully request that this honorable Court approve the settlement that the parties have reached concerning all claims, including the Plaintiffs' claims under the Fair Labor Standards Act (hereinafter, "FLSA") 29 U.S.C. 201, *et seq.* For the reasons set forth in the accompanying Memorandum of Law, the Parties seek Court approval of the settlement because claims under the FLSA, such as those released by the Plaintiffs in the Settlement Agreement and Release, may not be waived or released without U.S. Department of Labor or Court approval.

[Signature page follows.]

Phone: 1-800-579-9864
Fax: 1-360-294-2165
Email: admin@hanoverlawpc.com

2751 Prosperity Ave., Suite 150
Fairfax Virginia 22031

HANOVER LAW, PC
1200 G. St. NW., Suite 800
Washington, DC 20005

Respectfully submitted,

FOR THE DEFENDANTS:

Sean R. Hanover, Esq.
Hanover Law, PC
2751 Prosperity Ave., Suite 150
Fairfax, VA 22031
703-402-2723
seanhanover@hanoverlawpc.com

FOR THE PLAINTIFFS:

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