

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

TONIA WILLIAMS and BEVERLY
DANTZLER, on behalf of themselves and all
others similarly situated,

Plaintiff,

v.

PHH MORTGAGE CORPORATION d/b/a
PHH MORTGAGE SERVICES,

Defendant.

Civil Action No. 3:25-CV-144-FDW-SCR

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT, CERTIFYING CLASSES FOR PURPOSE OF SETTLEMENT,
DIRECTING NOTICE TO THE CLASSES, AND SCHEDULING FAIRNESS HEARING**

Plaintiffs Tonia Williams and Beverly Dantzler, individual and on behalf all others similarly situated, pursuant to Rule 23 of the Federal Rules of Civil Procedure and respectfully move the Court to enter an Order Preliminarily Approving this Class Action Settlement Agreement; provisionally certifying the Classes and appointing the Class Representatives and Class Counsel; approving the content, form and manner of notice proposed to be sent to the members of the Classes; setting dates and procedures for the fairness hearing and staying all other deadlines and proceedings until further order of the Court.

While not admitting any fault or liability, Defendant does not oppose the relief sought in this motion.

Plaintiffs support this motion with a memorandum and exhibits filed contemporaneously with this motion, and such other written or oral arguments as are permitted or requested by the Court.

WHEREFORE, Plaintiffs respectfully request that this Court grant the motion and enter the proposed Order on Preliminary Approval of Class Settlement.

Dated: January 16, 2026.

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*Attorneys for Plaintiffs and the putative
Classes*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was filed electronically with the clerk of court via the CM/ECF document filing service which provided notice of the electronic filing to all parties through their counsel of record.

This the 16th day of January, 2026.

BRYSON HARRIS SUCIU
& DeMAY PLLC

/s/ Scott C. Harris
Scott C. Harris