

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

FRANCES J. HANLON, on behalf of)
herself and those similarly situated,)

Plaintiff,)

V.)

CASE NO. 21 CV 3057

PHH MORTGAGE CORPORATION,)
AS SUCCESSOR TO MAVERIK)
FINANCIAL CORP., PHH MORTGAGE)
SERVICING CORPORATION, AND)
PHH MORTGAGE SERVICES)

Defendants.)

MOTION TO VOLUNTARILY DISMISS WITH PREJUDICE

Now Comes Plaintiff, FRANCES J. HANLON. with her motion to voluntarily dismiss with prejudice her claims and voluntarily dismiss without prejudice the claims of the uncertified class and in support of this motion states as follows:

1. Plaintiff, Frances J. Hanlon, has been made whole by Defendant PHH Mortgage Corporation. As such, Plaintiff, Frances J. Hanlon can no longer adequately represent the putative class.

2. Plaintiff, seeks dismissal of this action in the interest of justice.

3. Pursuant to Rule 23 a motion to dismiss the cause of action of the uncertified class is necessary to dispose of this action.

WHEREFORE, Plaintiff prays this court dismiss with prejudice the claims of Frances J. Hanlon and dismiss without prejudice the claims of the uncertified class.

Respectfully submitted,

/s/Robert T. Hanlon,
Robert T. Hanlon
Attorney for Plaintiff

Dated: September 7, 2021

Prepared by:
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