IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:23-cv-00423-WO-JGM

TIMIA CHAPLIN; SARAH FIELDS; THOMAS HAYWARD; ANTHONY MILLER; KEVIN SPRUILL; ROTESHA MCNEIL; YOUSEF JALLAL; MESSIEJAH BRADLEY; DENNIS KEITH LASSITER; and ALLEN SIFFORD, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

GARRY L. MCFADDEN, officially, as the Sheriff of Mecklenburg County; OHIO CASUALTY INSURANCE COMPANY, as the surety for the Sheriff of Mecklenburg County; TYLER TECHNOLOGIES, INC.; and DOES 1 THROUGH 20, INCLUSIVE,

Defendants.

PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT

Plaintiffs Timia Chaplin, Sarah Fields, Thomas Hayward, Kevin Spruill, Rotesha McNeil, Yousef Jallal, Messiejah Bradley, Dennis Keith Lassiter and Allen Sifford (collectively, "Plaintiffs" or the "Settlement Class Representatives"[1]), on behalf of themselves and the proposed classes they seek to represent, respectfully move this Court pursuant to Rule 23(e) of the Federal Rules of Civil Procedure for preliminary approval of a proposed class action settlement with Tyler Technologies, Inc. ("Defendant Tyler").[2] Specifically, Plaintiffs request an

[1] Unless otherwise defined herein, capitalized terms have the meanings stated in the Class Action Settlement Agreement and Release ("Settlement" or "Settlement Agreement").

[2] Plaintiff Anthony Miller does not assert a claim against Defendant Tyler.

Order that does the following: (a) grants preliminary approval of the proposed Settlement; (b) certifies the Settlement Classes for settlement purposes; (c) approves the proposed form of notice; (d) approves the proposed manner of disseminating notice; (e) sets a date and time for the Final Approval Hearing; and (f) grants such other relief as this Court deems just and proper.[3]

Plaintiffs have included with this Motion the following:

- The Settlement Agreement attached hereto as **Attachment 1**.
- Exhibits to the Settlement Agreement:
    - **Exhibit A**: Short Notice
    - **Exhibit B**: Long Notice
    - **Exhibit C**: Overdetention Claim Form
    - **Exhibit D**: Wrongful Arrest Claim Form
    - **Exhibit E**: [Proposed] Final Approval Order and Judgment as to Defendant Tyler.
- A Settlement Class Counsel resume and declaration attached hereto as **Attachment 2**.
- The Declaration of Christie K. Reed of Kroll Settlement Administration LLC attached hereto as **Attachment 3**.
- A [Proposed] Order Preliminarily Approving Settlement and Providing for Class Notice attached hereto as **Attachment 4**.

Plaintiffs have also filed separately a memorandum in support of this Motion.

* * * Signature Block Appears on Next Page * * *

[3] The Settlement resolves claims only against Defendant Tyler. The claims against the remaining defendant (Mecklenburg County Sheriff Garry L. McFadden) continue.

This the 26th day of October, 2026.

/s/ Gagan Gupta
Gagan Gupta (NCSB #: 53119)
Email: ggupta@tinfulton.com
Abraham Rubert-Schewel (NCSB #: 56863)
Email: schewel@tinfulton.com
Zachary Ezor (NCSB #: 55070)
Email: zezor@tinfulton.com
TIN FULTON WALKER & OWEN PLLC
119 Orange Street, Floor 2
Durham, NC 27701
Telephone: (919) 585-4647

A. Dami Animashuan
Email: dami@animashuan.me
355 S. Grand Ave, Suite 2450
Los Angeles, CA 90071
Telephone: (929) 266-3971

Counsel for Plaintiffs on behalf of themselves and all others similarly situated

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed using the Court's CM/ECF system, which will automatically notify all counsel of record.

This the 26th day of October, 2026.

/s/ Gagan Gupta
Gagan Gupta (NCSB #: 53119)

Counsel for Plaintiffs on behalf of themselves and all others similarly situated