

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRANKIE LIPSETT, individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

BANCO POPULAR NORTH AMERICA,

Defendant.

Case No.: 1:22-cv-03901-MMG

**CLASS COUNSEL AND THE CLASS REPRESENTATIVE'S RESPONSE
REGARDING NO OBJECTIONS TO THE CLASS ACTION SETTLEMENT**

Not a single class member has objected to any aspect of the Settlement. In stark contrast, notice has been sent directly to over 13,000 class members. (See Supplemental Affirmation of Cameron R. Azari Regarding Implementation and Adequacy of Notice Plan (ECF No. 59) at ¶¶ 11, 13)). As discussed in Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motion for Final Approval of the Settlement Class; Final Certification of the Settlement; Payment of Attorney Fees and Reimbursement of Costs to Class Counsel; and, Payment of Service Award to the Class Representative (ECF No. 56)(“Mem.”), this factor further underscores why Plaintiff’s Motion for Final Approval should now be granted. (See Mem. at p. 13).

Dated: December 23, 2024

Respectfully submitted,

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Court Appointed Co-Lead Class Counsel