

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

REYNALDO REYES,  
on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

ZIONS FIRST NATIONAL BANK,  
NETDEPOSIT, LLC,  
MP TECHNOLOGIES d/b/a MODERN  
PAYMENTS, TELEDRAFT, INC., NATIONAL  
PENN BANK, WELLS FARGO BANK, N.A., and  
WACHOVIA BANK, N.A.,  
Defendants.

CIVIL ACTION NO. 10-00345

**MOTION FOR CLASS CERTIFICATION  
AND FOR FINAL APPROVAL OF THE PROPOSED SETTLEMENT**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiff Reynaldo Reyes, on behalf of himself and the Class the Court provisionally certified on July 8, 2016, respectfully moves the Court for an order finally certifying the class and for final approval of the Settlement Agreement (“Agreement”) with the Zions Defendants in the above-captioned matter. The grounds for this motion are set forth in the Memorandum of Law In Support of Plaintiffs’ Motion for Class Certification and for Final Approval of Class Action Settlement, and are further supported by the Declarations of Howard Langer, Stephen Saltzburg, and Ronald Bertino, the papers submitted as part of Plaintiffs’ petition for an award of fees and expenses, and all papers and records on file in this matter.

Dated: October 17, 2016

Respectfully Submitted,

*Howard Langer*

Howard Langer

John Grogan

Edward Diver

Irv Ackelsberg

Peter Leckman

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*Class Counsel*