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IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ELMORE

* * * * *

CYNTHIA LOPEZ, on behalf of herself and)
all others similarly situated,) Case No. CV20-20-00568
Plaintiff,)
vs.)
PIONEER FEDERAL CREDIT UNION,)
Defendant.)

)

Plaintiff, by counsel, respectfully moves the Court to certify the following Plaintiff Class under Idaho Rule of Civil Procedure 77:

All citizens of Idaho who, from January 16, 2014 forward, were charged an Overdraft Fee on an item that did not overdraw the account balance on Pioneer's monthly account statements.

Plaintiff further moves the Court to appoint her as Class Representative of this Class and to appoint her counsel as Class Counsel. Plaintiff has submitted a separate memorandum in support of this Motion.

DATED this 8th day of February, 2022.

HEPWORTH HOLZER, LLP

By /s/ Kurt D. Holzer

Kurt D. Holzer
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed with the Clerk of the Court the foregoing using the ICourt E-File system which will send notification of such filing to:

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DATED February 8, 2022.

/s/ Kurt D. Holzer

Kurt D. Holzer