

1 Jefferson R. Hayden (SBN: 026264)  
2 **GAMMAGE & BURNHAM PLC**  
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8 *Attorneys for Defendant*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF ARIZONA

11 Richard Winters, Jr., individually and  
12 on behalf of all others similarly situated,

13 Plaintiff,

14 vs.

15 American Senior Benefits, LLC, an Ohio  
16 limited liability company,

17 Defendant.

NO. 2:20-cv-02423-DWL

**NOTICE OF SETTLEMENT**

18 Plaintiff Richard Winters, Jr. (“Plaintiff”) and Defendant American Senior  
19 Benefits, LLC (“Defendant”) (together, “Parties”), hereby notify the Court that they have  
20 reached a settlement in this matter. As such, the parties respectfully request that all  
21 pending deadlines in this matter, including Defendant American Senior Benefits, LLC’s  
22 Answer deadline, be held in abeyance while they finalize a formal settlement agreement  
23 and implement the terms of their settlement. The Parties anticipate settlement will be  
24 completed in the next 30 days, if not sooner. Once completed, the Parties will enter into  
25 a stipulation for dismissal with prejudice.  
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DATED this 12th day of March, 2021.

**GAMMAGE & BURNHAM PLC**

By: s/Jefferson R. Hayden  
Jefferson Hayden  
*Attorneys for Defendant*  
*American Senior Benefits, LLC*

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**CERTIFICATE OF SERVICE**

I hereby certify that, on March 12, 2021, I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Service of Electronic Filing to all registered counsel of record.

By: /s/ Elizabeth Guerrero