

**IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

Peggy Keltner, Jerome and Beverly Johnson,)
Melinda Duniphan and Shelby Siebert,)
)
Plaintiffs,)
)
vs.)
)
SunCoke Energy, Inc. and Gateway Energy &)
Coke Company, LLC and United States Steel)
Corporation,)
)
Defendants.)

Case No.: 2014-L-1540

JOINT MOTION FOR APPROVAL OF CLASS SETTLEMENT

COME NOW Plaintiffs Peggy Keltner, Jerome and Beverly Johnson and Melinda Duniphan, on behalf of themselves and all others similarly situated (collectively “Plaintiffs”), and Defendants SunCoke Energy, Inc., Gateway Energy & Coke Company, LLC and United States Steel Corporation (collectively “Defendants”), by and through their undersigned counsel, and for their Joint Motion for Approval of Class Settlement, state as follows:

1. The parties and their Counsel have engaged in substantial settlement negotiations over the course of 12 months, and as a result, a settlement has been reached. Thereafter, the parties have worked together to prepare documents reflecting the terms of the proposed settlement.

2. Submitted contemporaneously with this Joint Motion for Approval is the Settlement Agreement, which provides a complete recitation of the settlement agreement reached between the parties.

3. Counsel for Plaintiffs and Defendants request the Court approve the proposed settlement as fair, reasonable and adequate, as Counsel for Plaintiffs and Defendants believe the settlement reached is fair, reasonable and adequate.

4. A proposed Order for Preliminary Approval is also submitted contemporaneously with this Joint Motion for Approval of Class Settlement.

5. Following notice to the Settlement Class and any objections or responses thereto, Plaintiffs and Defendants jointly request a hearing for final approval of the class settlement.

WHEREFORE, Plaintiffs Peggy Keltner, Jerome and Beverly Johnson and Melinda Duniphan, on behalf of themselves and all others similarly situated, and Defendants SunCoke Energy, Inc., Gateway Energy & Coke Company, LLC and United States Steel Corporation, respectfully request the Court grant preliminary approval so notice can be given to the Settlement Class. Further, it is requested that a hearing date be set for final approval of the Settlement Agreement.

Dated: August 4, 2017

SIMMONS HANLY CONROY LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served by electronic mail (email), to the following attorneys of record on this 4th day of August, 2017:

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