

COMMONWEALTH OF KENTUCKY
COUNTY OF FRANKLIN CIRCUIT COURT
CASE NO. 17-CI-1348
DIVISION ONE

JEFFREY C. MAYBERRY, *et al.*

PLAINTIFFS

v. **THE TIER 3 PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR LEAVE TO FILE A
THIRD AMENDED COMPLAINT**

KKR & CO., L.P., *et al.*

DEFENDANTS

ELECTRONICALLY FILED

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PLEASE TAKE NOTICE that, on January 11, 2021, at the conclusion of the motion hour docket (9:00 a.m. Eastern Time), or as soon thereafter as counsel may be heard, Ashley Hall-Nagy, Tia Taylor and Bobby Estes (the "Tier 3 Plaintiffs") will, and hereby do, move the Court, before the Honorable Phillip J. Shepherd, at the Franklin County Courthouse, located at 222 St. Clair Street, Frankfort, Kentucky 40601, for entry of an order under Rule 15.01 of the Kentucky Rules of Civil Procedure:

- granting the Tier 3 Plaintiffs leave to file a third amended complaint; and
- granting such other and further relief as the Court deems just and proper.

The Tier 3 Plaintiffs expect that the hearing time will exceed ten minutes.

In support of this motion, the Tier 3 Plaintiffs submit the accompanying Proposed Third Amended Verified Complaint and the accompanying memorandum, together with Exhibits A and B, and rely on all papers and proceedings in this action.

Dated: December 31, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

The above signature certifies that, on December 31, 2020, the foregoing was served via email in accordance with any notice of electronic service or, in the absence of an electronic notification address, via email or mail as indicated below, to:

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