

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY**

TONI FLOYD and CHERI NICHOLSON  
On behalf of themselves and all those similarly  
situated

Plaintiffs,

v.

Civil Action No. 3:21-cv-00058-DJH

HON. ANNETTE KAREM, in her official capacity  
as Chief Judge of the Jefferson County District Court  
Defendant.

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Come Plaintiffs Toni Floyd and Cheri Nicholson, by and through counsel, and move this  
Court for an order certifying the following class pursuant to Fed. R. Civ. P. 23(b)(2):

All defendants in forcible detainer actions pending before the Jefferson District  
Court who have not received notice "reasonably calculated, under all the circum-  
stances...to afford them an opportunity to present their objections."

Dated: February 9, 2021

Respectfully Submitted,

*/s/ Ben Carter*

Ben Carter

KENTUCKY EQUAL JUSTICE CENTER

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of February, 2021 I filed the foregoing motion in the Court's electronic filing system, which will cause the document to be served electronically on counsel of record for all parties in this action.

*/s/ Ben Carter*

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Ben Carter