

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS**

DARRYL TAYBORN, on behalf of himself)	)	
and all other similarly situated,	)	
	)	Civil Action No. 4:19-cv-04247
Plaintiff,	)	
	)	
vs.	)	
	)	
VIBRANT CREDIT UNION,	)	
	)	
Defendant.	)	

**NOTICE OF SETTLEMENT**

Please take notice that Plaintiff Darryl Tayborn (“Plaintiff”) and Defendant Vibrant Credit Union (“Defendant”) by and through their respective attorneys, have reached a settlement of all claims against Defendant. The parties are in the process of documenting the settlement and they anticipate completing this process, including filing a stipulation for dismissal, within sixty (60) days. The parties respectfully request that the Court stay the action and vacate all remaining dates in light of the settlement.

Respectfully submitted,

Dated: October 20, 2020

/s/ Stuart M. Richter

Stuart M. Richter  
Andrew J. Demko  
KATTEN MUCHIN ROSENMAN LLP  
2029 Century Park East, Suite 2600  
Los Angeles, CA 90067-3012  
(310) 788-4400  
[stuart.richter@katten.com](mailto:stuart.richter@katten.com)  
[andrew.demko@katten.com](mailto:andrew.demko@katten.com)

Jason J. O’Rourke  
Brett R. Marshall  
LANE & WATERMAN LLP

220 North Main St., Suite 600  
Davenport, IA 52801  
Telephone: 563-324-3246  
Fax: 563-324-1616  
jorouke@l-wlaw.com  
bmarshall@l-wlaw.com

*Attorneys for Defendant*

Dated: October 20, 2020

/s/ Jeffrey D. Kaliel

Jeffrey D. Kaliel  
Sophia G. Gold  
KALIEL PLLC  
1875 Connecticut Ave. NW 10th Floor  
Washington, D.C. 20009  
(202) 350-4783  
[Jkaliel@kaliellpc.com](mailto:Jkaliel@kaliellpc.com)  
[sgold@kaliellpc.com](mailto:sgold@kaliellpc.com)

Kyle Shamberg  
CARLSON LYNCH LLP  
111 W. Washington Street, Suite 1240  
Chicago, IL 60602  
(312) 750-1592  
kshamberg@carlsonlynch.com

*Attorneys for Plaintiff and the Proposed Class*

**CERTIFICATE OF SERVICE AND FILING**

I hereby certify that on October 20, 2020, I electronically filed the foregoing with the Clerk of the Court for the Central District of Illinois by using the CM/ECF system which will provide notification of such filing to all counsel of record.

By: /s/ *Stuart M. Richter*