

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JONATHAN RANGEL, individually and on
behalf of all other similarly situated persons,

Plaintiffs,

vs.

Case No. 1:25-cv-01288

DMV PROTECTION LLC, and JOVAN
VLADIC,

Defendants.

PLAINTIFFS' MOTION FOR CORRECTION OR RECONSIDERATION (DKT. 146)

Pursuant to Rules 54 and 60 of the Federal Rules of Civil Procedure, Plaintiffs respectfully move the Court to correct or reconsider the June 23, 2026 Order granting and denying in part Plaintiffs' motion for supplemental discovery. Dkt. 146. Although the Court ordered Defendants to produce supplemental Gusto pay records, NovaGems time data, and DMV's internal time tracker documents for opt-in Plaintiffs, the Court did not extend the Order to class members. Because Plaintiffs need the supplemental data (from November 3, 2026 to present) for damage calculations, Plaintiffs respectfully request that the Court enter the Proposed Order, and Order Defendants to produce supplemental Gusto pay records, NovaGems time data, and DMV's internal time tracker documents for the 42 class members listed in Exhibit 1.

A memorandum in support of this motion is being filed concurrently.

Dated: July 1, 2026

Respectfully submitted,

/s/ Matt Dunn

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Class

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Rule 23 Class

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2026, I filed the foregoing with the Court's ECF system which will send electronic notice of the same to all counsel of record.

/s/ Timothy Coffield