

**FILED**

**DEC 05 2003**

**LARRY W. PROPES, CLERK  
U. S. DISTRICT COURT**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION**

**FRANKLIN E. CLARK**  
*on behalf of himself*  
*and all other similarly situated,*

**Plaintiffs,**

**- against -**

**EXPERIAN INFORMATION  
SOLUTIONS, INC.**

**Defendants.**

**Civil Action No. 8-00-CV-1217-22**

-----X  
**FRANKLIN E. CLARK and  
LATANJALA DENISE MILLER**  
*on behalf of themselves*  
*and all other similarly situated,*

**Plaintiffs,**

**- against -**

**EQUIFAX CREDIT INFORMATION  
SERVICES, INC.,**

**Defendants.**

**Civil Action No. 8-00-CV-1218-22**



-----X  
**FRANKLIN E. CLARK**  
*on behalf of himself*  
*and all other similarly situated,*

**Plaintiffs,**

**- against -**

**TRANS UNION L.L.C.,**

**Defendants.**

**Civil Action No. 8-00-CV-1219-22**

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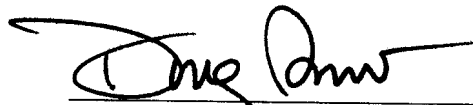
**PLAINTIFFS' REPLY TO COORDINATED OBJECTORS' RESPONSE  
TO MODIFIED STIPULATIONS OF SETTLEMENT**

Plaintiffs, by and through undersigned Class Counsel, hereby respond to Coordinated Objectors' Response to Modified Stipulations of Settlement.

At the fairness hearing held September 23 and 24, 2003, this Court identified its concerns with the original Stipulations of Settlement. Thereafter, Class Counsel, to address the Court's concerns, negotiated changes and clarifications to the original stipulations and incorporated those into the Modified Stipulations of Settlement that have been filed with this Court.

Class Counsel will reserve its right to address Coordinated Objectors' assertions as to the benefits they claim to have conferred at the fairness hearing scheduled in January 2004. Class Counsel, however, would like to assure the Court and members of the class that at no time, particularly during the Holidays, has Class Counsel been unavailable to address concerns of Objectors or Defendants.

Respectfully submitted,



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Dated: December 24, 2003  
Spartanburg, South Carolina

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

RECEIVED

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Defendant.

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EQUIFAX CREDIT INFORMATION  
SERVICES, INC.,

Defendant.

Civil Action No. 8-00-CV-1218-22 ✕

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FRANKLIN E. CLARK  
*on behalf of himself*  
*and all other similarly situated,*

Plaintiffs,

- against -

TRANS UNION L.L.C.,

Defendant.

Civil Action No. 8-00-CV-1219-22

-----X  
CERTIFICATE OF SERVICE

I, Dana B. Hawkins, Legal Assistant to Doug Smith of the firm of Johnson, Smith, Hibbard & Wildman Law Firm, L.L.P., do hereby certify that on the 4<sup>th</sup> day of **December, 2003**, I served a copy of the following documents on counsel for the Defendants and the designated counsel for Objectors by facsimile transmission and by depositing copies of the same in the United States Post Office at Spartanburg, South Carolina, with proper postage affixed thereto to the addresses shown below:

**Documents Served:**

Plaintiffs' Reply to Coordinated Objectors' Response to Modified Stipulations of Settlement

**Counsel Served:**

Tom Harney (via fax and U. S. Mail)  
Kilpatrick Stockton  
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**Dana B. Hawkins**  
Legal Assistant to Doug Smith