

Pursuant to this Motion, Plaintiffs respectfully request:

1. That the Court enter an Order certifying the Settlement Class¹ under Federal Rule of Civil Procedure 23(b)(1) for settlement purposes only, appointing Plaintiffs as class representatives, appointing Scott+Scott Attorneys at Law LLP, Peiffer Wolf Carr Kane & Conway LLP, and The Law Offices of Michael M. Mulder as Class Counsel, and granting preliminary approval of the Settlement;
2. That the Court order any interested party to file any objections to the Settlement within the time limit set by the Court along with supporting documentation, and order such objections, if any, to be served on counsel as set forth in the proposed Preliminary Approval Order and Settlement Notices;
3. That the Court schedule a Fairness Hearing for the purposes of receiving evidence, argument, and any objections relating to the Settlement; and
4. That following the Fairness Hearing, the Court enter an Order granting final approval of the Settlement, retaining jurisdiction to enforce the terms of the Settlement, and otherwise dismissing the complaint in this action with prejudice.

¹ All capitalized terms not defined herein have the meanings ascribed to them in the Class Action Settlement Agreement dated December 6, 2024, which is attached as Exhibit A to the Declaration of Kristen M. Anderson in Support of Motion for Preliminary Approval of Proposed Settlement and Authorization to Disseminate Notice of the Settlement.

Dated: January 6, 2025

Respectfully submitted,

/s/ Kristen M. Anderson

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system to send notification of such filing to all counsel of record.

/s/ Kristen M. Anderson
Kristen M. Anderson