IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

KIM SNYDER, on behalf of herself and all others similarly situated,) CASE NO. 0:21-CV-01049 (JRT/DJF)
an others similarly situated,) CLASCACTION
-4) <u>CLASS ACTION</u>
Plaintiff,)
) PLAINTIFF'S MOTION FOR
v.) PRELIMINARY APPROVAL OF
) CLASS ACTION SETTLEMENT
UNITEDHEALTH GROUP, INC., et al.)
)
Defendants.)

PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiff Kim Snyder now moves the Court to enter an order preliminarily approving the Class Action Settlement reached by the Parties to resolve the class claims.

In support of this motion, Plaintiff relies upon the accompanying Memorandum of Law in Support of Plaintiff's Motion for Entry of Preliminary Approval Order; the Declarations of counsel Charles Field and Plaintiff in Support of Plaintiff's Motion for Preliminary Approval Order; the Class Action Settlement Agreement; and all other records, pleadings, and papers on file in this action.

Plaintiff respectfully requests that the Court enter an order:

1. Granting preliminary approval of the settlement;

- 2. Enjoining Class Members from pursuing any claims that arise out of or relate to the claims at issue in this action pending final approval;
- 3. Directing notice to Class Members and approving the plan and the form of notice, including the procedures for objecting to the Settlement;
- 4. Appointing Angeion Group, LLC as Settlement Administrator and Escrow Agent; and
- 5. Scheduling a final Fairness Hearing, at which the Court will consider the motion for final approval of the Settlement and entry of the parties' proposed final order and judgment and Class Counsel's application for an award of attorneys' fees and expenses and payment of a Class Representative service award.

Dated: December 13, 2024 /s/ Charles H. Field

Charles H. Field, CA Bar No. 189817*
SANFORD HEISLER SHARP McKNIGHT, LLP

7911 Herschel Avenue, Suite 300

La Jolla, CA 92037

Telephone: (619) 577-4252 Facsimile: (619) 577-4250

cfield@sanfordheisler.com

David Sanford, NY Bar No. 5695671*

SANFORD HEISLER SHARP McKNIGHT, LLP

17 State Street, Suite 3700

New York, NY 10004

Phone: (646) 402-5656 Facsimile: (646) 402-5651

dsanford@sanfordheisler.com

Kevin H. Sharp, TN Bar No. 16287*

Leigh Anne St. Charles, TN Bar No. 36945*

Brent Hannafan, TN Bar No. 25209*

SANFORD HEISLER SHARP McKNIGHT, LLP

611 Commerce Street, Suite 3100

Nashville, TN 37203 Phone: (615) 434-7000 Facsimile: (615) 434-7020 ksharp@sanfordheisler.com lstcharles@sanfordheisler.com bhannafan@sanfordheisler.com

Susan M. Coler, MN Bar No. 0217621

HALUNEN LAW

1650 IDS Center 80 South 8th Street Minneapolis, MN 55402

Telephone: (612) 605-4098 Facsimile: (612) 605-4099 coler@halunenlaw.com

Attorneys for Plaintiff and the Class

^{*} Admitted pro hac vice