

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE SHIELDS HEALTH GROUP, INC  
DATA BREACH LITIGATION

CASE NO. 1:22-cv-10901-PBS

Hon. Patti B. Saris

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
PROPOSED CLASS ACTION SETTLEMENT AND DIRECTION OF CLASS NOTICE**

**PLEASE TAKE NOTICE** that Plaintiffs James Buechler, Julie Colby, John Kennedy, Sharon Pimental, and Cindy Tapper ("Plaintiffs"), by and through their counsel, respectfully moves for an Order under Federal Rule of Civil Procedure 23:

- (1) Preliminarily approving the proposed Settlement on behalf of the Settlement Class according to the terms of the Agreement;
- (2) Provisionally certifying, for purposes of settlement only, the Settlement Class defined as:

All persons residing in the United States that Shields identified as potentially having their Personal Information impacted by the Data Incident and that are residents of any U.S. State, U.S. territory, or the District of Columbia, other than Massachusetts.

The Settlement Class specifically excludes: (1) any Judge or Magistrate Judge presiding over the Litigation, any members of the Judges' respective staffs, and immediate members of the Judges' respective families; (2) officers, directors, members, and shareholders of the Defendant; (3) persons in the Federal Action Settlement Class who timely and validly request exclusion from and/or opt-out of the Settlement Class and the successors and assigns of any such excluded persons; (4) any persons whose claims in this matter have been finally adjudicated on the merits or otherwise released; (5) Parties' Counsel; and (6) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the criminal activity or occurrence of the Data Incident or who pleads nolo contendere to any such charge.

- (3) Preliminarily appointing Plaintiffs as Class Representatives;

- (4) Preliminarily appointing George Feldman McDonald, PLLC; Lynch Carpenter LLP; Keller Postman; Morgan & Morgan; and Mazow McCullough, PC as Class Counsel to act on behalf of the Settlement Class and Class Representatives with respect to the Settlement;
- (5) Approving the selection of Analytics Consulting, LLC as Settlement Administrator;
- (6) Approving the Parties' proposed Notice Plan;
- (7) Entering the proposed Preliminary Approval Order, which was submitted concurrently herewith;
- (8) Scheduling further proceedings, including deadlines and a hearing at which time the Court will consider the parties' request for final settlement approval; and
- (9) Granting such other and further relief as may be just and appropriate.

This Motion is based upon this notice, the Joint Declaration of Proposed Class Counsel and accompanying exhibits, the concurrently filed memorandum of points and authorities, and upon all prior proceedings, pleadings, and filings in the above-captioned action.

Dated: May 15, 2025

Respectfully submitted,

/s/ Brendan Jarboe

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to counsel for all parties on May 15, 2025.

/s/ Brendan Jarboe  
Brendan Jarboe