

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TONY GOODRUM, MARTY WOOLEY,  
TODD CLAY, and TANYA WALKER,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

VERADIGM, INC.,

Defendant.

CASE NO.: 1:25-cv-07062

**JOINT MOTION TO APPROVE AMENDMENT TO SETTLEMENT AGREEMENT**

Plaintiffs<sup>1</sup> and Defendant respectfully request the Court enter an order approving an amendment to the Settlement Agreement, a copy of which is hereto as *Exhibit A*.

1. Following the Preliminary Approval Order (ECF No. 36), and based on additional analysis and data mining, the Parties came to estimate that the Settlement Class included approximately 500,000 more members than the Parties had originally estimated and used as the basis to negotiate the monetary terms of the Settlement.

2. The increase in the Settlement Class size was not anticipated by the Parties and only became known as the Settlement Administrator completed its analysis of the class data, which is comprised of over three million people's information collected from multiple sources.

3. As a result of the increase in the class size, the Parties renegotiated the amount of the non-reversionary Settlement Fund from \$8,750,000 to \$10,500,000. All relief to Settlement Class Members remains the same.

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<sup>1</sup> All capitalized terms used herein shall have the same meanings as those defined in Section II of the Settlement Agreement. [ECF No. 26-1].

4. For a portion of the additional Settlement Class Members, neither physical addresses nor email addresses are available. Consequently, to provide the appropriate requisite notice of the Settlement, the Parties, after consultation with the Settlement Administrator, the Notice Program will be supplemented by Publication Notice to the existing approved Notice Program. The Publication Notice will involve a targeted media campaign, including online display banner advertising, Google keyword search advertising, and social media advertising through Facebook, all specifically designed to engage Settlement Class Members who were impacted by the Data Incident. A Supplemental Declaration of the Settlement Administration supporting the addition of Publication Notice to the existing Notice Program is attached as ***Exhibit B***.

5. The Amendment to the Settlement Agreement does not modify any other terms of the Settlement.

6. Notice has not yet been sent to the Settlement Class. Consequently, should the Court approve the amendment, there would be no need to adjust the schedule outlined in the Preliminary Approval Order.

7. There will be no additional increase in the amount of the estimated Settlement Administration Costs of \$1.35 - \$1.79 million, because as expected, the Settlement Administrator has identified more email addresses to send notice to, which has resulted in a cost savings when taking into account the larger notice population.

8. Based on the foregoing, the Parties respectfully request entry of an order that approves the Amendment to the Settlement Agreement. A proposed order is attached as ***Exhibit C***.

Dated: October 13, 2025.

Respectfully submitted,

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