

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

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| <b>CONCETTA C. VERDERAME, on behalf<br/>of herself and all others similarly situated</b><br><br><p style="text-align: center;"><b>Plaintiff,</b></p> <p style="text-align: center;"><b>v.</b></p> <p><b>FUTURITY FIRST INSURANCE<br/>GROUP, LLC,</b></p> <p style="text-align: center;"><b>Defendant.</b></p> | <b>Case No: 3:24-cv-01262-KAD</b> |
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**PLAINTIFF’S NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT, TO AUTHORIZE CLASS NOTICE,  
AND TO SCHEDULE A FINAL APPROVAL HEARING**

**PLEASE TAKE NOTICE** that upon the Declaration of Marc H. Edelson, the Declaration of Seth R. Lesser, and the Declaration of Richard W. Simmons, and the accompanying memorandum of law, Plaintiff, by and through her undersigned counsel, shall jointly move this Court, at a time to be determined by the Court, for an Order (1) granting preliminary approval of the Settlement; (2) certifying the Class for the purpose of the Settlement pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3); (3) ordering the Settlement Administrator to direct and issue notice to the Class under the terms of the Settlement Agreement; (4) appointing Concetta C. Verderame as Class Representative for the purpose of the Settlement; (5) appointing Marc Edelson of Edelson Lechtzin LLP, and Seth Lesser of Klafter Lesser LLP as Plaintiff’s Counsel for the Settlement Class; and (6) entering the Settlement schedule as proposed by the terms of the Settlement Agreement.

Defendant Futurity does not oppose the relief sought in this motion. A copy of the proposed Settlement Agreement is attached as Exhibit A to the Declaration of Marc H. Edelson.

Respectfully submitted,



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***Counsel for Plaintiff and the Proposed Class***