

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

ALEXSIS WEBB and MARSCLETTE
CHARLEY, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

INJURED WORKERS PHARMACY,
LLC,

Defendant.

Case No. 1:22-cv-10797-RGS

Judge Richard G. Stearns

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement, the Joint Declaration of Plaintiffs' Counsel in Support of Plaintiffs' Unopposed Motion for Preliminary Approval and its exhibits thereto, and all prior pleadings and proceedings had herein, Plaintiffs Alexis Webb and Marsclette Charley, individually and on behalf of the putative class, (collectively, "Plaintiffs") move pursuant to Federal Rule of Civil Procedure 23 for and Order: (1) granting preliminary approval of the proposed Settlement; (2) preliminarily certifying a class for purposes of Settlement; (3) appointing Plaintiffs as Class Representatives; (4) appointing David K. Lietz and Raina C. Borelli as Class Counsel; (5) approving the Parties' proposed form and method of giving notice of the pendency of this action and the Settlement to the Settlement Class; (6) directing that notice be given to the Settlement Class; (7) scheduling a hearing at which time the Court will consider the request for final approval of the Settlement and request for attorneys' fees, expenses, and service

awards to Plaintiffs; and (8) granting such other relief and further relief as the Court deems just and proper.

Dated: August 2, 2024

Respectfully submitted,

s/ David K. Lietz

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

s/ David K. Lietz

David K. Lietz