

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

JOHN MCNALLY, JOYCE NEWMAN,
ANDREW SNAITH, PATRICK
KENNEMUR, KELLY COLLINS, DEANA
LINDLEY, JOSH STROCK, MOHAMAD
RAYCHOUNI, and NATHANIEL SEIBERT,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

v.

INFOSYS MCCAMISH SYSTEMS, LLC,

Defendant.

Case No. 1:24-CV-00995-JPB

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Plaintiffs John McNally, Jonathan Ayres, Kelly Collins, Debora Fisk, Patricia Kennemur, Deana Lindley, Vivian Lindley, Joyce Newman, David Owens, Chianti Prosser, Mohamad Raychouni, Nathaniel Seibert, Josh Strock, and Kevin Williams (“Plaintiffs”), individually and on behalf of others similarly situated, hereby moves this Court for entry of an Order and Final Judgment granting:

1. Final approval of the Class Settlement Agreement (“Settlement Agreement” or “Settlement”) between Plaintiffs and Defendant Infosys McCamish

Systems, LLC (“Defendant”), and the attachments thereto, which the Court preliminarily approved on July 16, 2025; and

2. Final certification of the proposed Settlement Class pursuant to Federal Rules of Civil Procedure Rule 23(e).

This Motion is based upon: (1) this Motion; (2) the Memorandum filed in Support of this Motion, filed herewith; (3) the Settlement Agreement; (4) the Declaration of the Settlement Administrator, filed herewith; (6) the [Proposed] Order and Final Judgment Granting Final Approval to Class Action Settlement and Certifying Settlement Class; (7) the records, pleadings, and papers filed in this action; and (8) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: December 4, 2025

Respectfully submitted,

/s/ Gary M. Klinger

Gary M. Klinger*

MILBERG, PLLC

227 W. Monroe Street, Suite 2100

Chicago, IL 60606

Telephone: (866) 252-0878

Facsimile: (865) 522-0049

Email: gklinger@milberg.com

/s/ J. Cameron Tribble

J. Cameron Tribble

Georgia Bar No. 754759

**THE BARNES LAW GROUP,
LLC**

31 Atlanta Street

Marietta, GA 30060

Telephone: (770) 227-6375
Facsimile: (770) 227-6373
Email: ctribble@barneslawgroup.com

/s/ Patrick A. Barthle II

Patrick A. Barthle II*
Florida Bar No. 99286
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
201 N. Franklin Street, 7th Floor
Tampa, Florida 33602
Telephone: (813) 229-4023
Facsimile: (813) 222-4708
Email: pbarthle@ForThePeople.com

/s/ Kevin Laukaitis

Kevin Laukaitis*
LAUKAITIS LAW LLC
954 Avenida Ponce De Leon
Suite 205, #10518
San Juan, PR 00907
Telephone: (215) 789-4462
Email: klaukaitis@laukaitislaw.com

Plaintiffs' Class Counsel

Ryan D. Maxey*
MAXEY LAW FIRM, P.A.
107 N. 11th St. #402
Tampa, Florida 33602
(813) 448-1125
Email: ryan@maxeyfirm.com
Jeff Ostrow*
KOPELOWITZ OSTROW P.A.
One West Las Olas Boulevard, Suite
500
Fort Lauderdale, FL 33301
Telephone: (954) 525-4100
Email: ostrow@kolawyers.com

Jeffrey Goldenberg*
**GOLDENBERG SCHNEIDER,
L.P.A.**
4445 Lake Forest Drive, Suite 490
Cincinnati, Ohio 45242
Telephone: 513-345-8297
Email: jgoldenberg@gs-legal.com

Charles E. Schaffer*
**LEVIN SEDRAN & BERMAN
LLP**
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500
Facsimile: (215) 592-4663
Email: cschaffer@lfsblaw.com

William B. Federman*
FEDERMAN & SHERWOOD
10205 North Pennsylvania Avenue
Oklahoma City, Oklahoma 73120
Tel: (405) 235-1560
Fax: (405) 239-2112
Email: wbf@federmanlaw.com

***Plaintiffs' Interim Executive
Committee***

*Admitted pro hac vice

CERTIFICATE OF COMPLIANCE

I hereby certify, in compliance with Local Rule 5.1(C), that the foregoing has been prepared using 14 point Times New Roman font, with margins of not less than 1 inch.

/s/ Gary M. Klinger
Gary M. Klinger

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which automatically sends e-mail notification of filing to any attorneys of record and pro se parties.

Dated: December 4, 2025.

/s/ Gary M. Klinger
Gary M. Klinger*
MILBERG, PLLC
227 W. Monroe Street, Suite 2100
Chicago, IL 60606
Telephone: (866) 252-0878
Facsimile: (865) 522-0049
Email: gklinger@milberg.com