

James E. Cecchi
CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700
jcecchi@carellabyrne.com

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION

Case No. 19-md-2904 (JKS)(MAH)

MDL 2904

This Document Relates To:

Labcorp Track.

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

Plaintiffs Aleksander Nazemnikov, Cameron Spencer, Carol Kaplan, Debra Wrenn, Edith Thrower, George Rothwell, Holly Laufenberg, Justin Nelson-Carter, Khristopher Thomas, Martha Cuvillier, Melanie Vazquez, Rosaria Gadero, Sandra Lassiter, Sheera Harris, Sherrie Palmer, Timothy Judelsohn, Tracy Buhr, Valerie Scott, Tatyana Shulman, David Finch, Gina Allende, and Wendy Wallach ("Plaintiffs"), on behalf of themselves and the proposed class, by and through their counsel, hereby respectfully request that the Court enter an Order:

- (1) Granting final approval of the Settlement set forth in the Settlement Agreement (the “SA”);
- (2) Certifying the Settlement Class for settlement purposes only;
- (3) Confirming the appointment of the law firms of Carella, Byrne, Cecchi, Brody & Agnello, P.C.; Nussbaum Law Group, P.C. and Robbins Geller Rudman & Dowd LLP as Settlement Class Counsel;
- (4) Appointing Plaintiffs as Settlement Class Representatives;
- (5) Appointing Kroll Settlement Administration as Settlement Claim Administrator;
- (6) Entering a final judgment dismissing the action as to Laboratory Corporation of America Holdings (“Labcorp”) with prejudice; and
- (7) Issuing related relief, as appropriate.

This Motion is based on the contemporaneously-filed memorandum of law in support of final approval submitted by Plaintiffs; the Declaration of Elias Rose of Kroll; and all pleadings, records, and papers on file with the Court in this action.

Dated: July 30, 2026

Respectfully submitted,

By: /s/ James E. Cecchi
CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700
jcecchi@carellabyrne.com

*Lead Counsel for Plaintiffs and the
Settlement Class*

Linda P. Nussbaum
NUSSBAUM LAW GROUP, P.C.
1225 Franklin Avenue, Suite 325
Garden City, NY 11530
Tel.: (917) 438-9189
lnussbaum@nussbaumpc.com

Stuart A. Davidson
**ROBBINS GELLER RUDMAN
& DOWD LLP**
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Tel.: (516) 750-3000
sdavidson@rgrdlaw.com

Labcorp Track Co-Lead Counsel