

DOCKET NO.: X07-HHD-CV-18-6090558-S	:	SUPERIOR COURT
	:	
WILLIAM & LAURIE PAETZOLD	:	COMPLEX LITIGATION
	:	
v.	:	JUDICIAL DISTRICT
	:	HARTFORD
METROPOLITAN DISTRICT	:	
COMMISSION	:	AT HARTFORD
	:	
	:	July 29, 2020

PLAINTIFFS’ MOTION FOR CONFIRMATION OF MODIFIED CLASS DEFINITION AND FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs William and Laurie Paetzold (“Plaintiffs”), individually and on behalf of the proposed Settlement Class,¹ respectfully move that the Court:

- (1) modify, for purposes of the Settlement, the definition of the certified Class (*see* [Dkt. No. 154.00]), to make minor changes that are reasonably necessary for clarity and settlement administration purposes and bring the definition of the certified class into accord with the class definition set forth in the Settlement Agreement; and
- (2) Approve the Settlement as set forth in the Settlement Agreement.

In support of this Motion, Plaintiffs by their counsel represents that: (1) the Settlement Class has received full and fair notice of the Settlement in accordance with the Notice Plan approved by the Court in its Preliminary Approval Order [Dkt No. 177.86]; (2) the Settlement Class meets the numerosity, commonality, typicality, adequacy, predominance and superiority

¹ All capitalized terms have the meaning set out in the Settlement Agreement.

requirements of Sections 9.7 and 9.8(3) of the Practice Book and therefore should be certified; and (3) the Settlement is fair, reasonable and adequate and merits final approval.

In further support of this Motion, Plaintiffs have filed:

- a Memorandum of Law specific to this Motion; and
- supporting affidavits from (i) Seth R. Klein of IZARD KINDALL & RAABE LLP and (ii) Jennifer M. Keough of JND Legal Administration, both of which also serve to support Plaintiffs' separate Motion for Award of Attorneys' Fees, Costs and Expenses and for Settlement Class Representative Awards, filed simultaneously herewith.

Plaintiffs will file a Proposed Order by August 27, 2020 in conjunction with their final update as ordered by the Court, and also will respond to any objections at that time.

Dated: July 29, 2020

PLAINTIFFS

BY /s/ Seth R. Klein
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CERTIFICATION

I certify that on this 29th day of July, 2020, a copy of the foregoing was sent by email to all counsel of record as follows:

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/s/ Seth R. Klein _____
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