

DOCKET NO.: X07-HHD-CV-18-6090558-S : SUPERIOR COURT
 :
WILLIAM & LAURIE PAETZOLD : COMPLEX LITIGATION
 :
v. : JUDICIAL DISTRICT
 : HARTFORD
METROPOLITAN DISTRICT :
COMMISSION : AT HARTFORD
 :
 : March 27, 2020

PLAINTIFFS' UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, MODIFICATION OF THE CERTIFIED CLASS FOR SETTLEMENT PURPOSES, APPROVAL OF NOTICE PLAN AND SCHEDULING OF FINAL APPROVAL HEARING

Plaintiffs William and Laurie Paetzold (“Plaintiffs”), individually and on behalf of the proposed Settlement Class (as defined in the Settlement Agreement, attached to the Affidavit of Seth R. Klein as Ex. 1), respectfully move that the Court enter an Order granting preliminary approval to the proposed Settlement and other related relief as set forth below.

In support of this Motion, Plaintiffs have filed an accompanying Memorandum of Law, a supporting affidavit by Seth R. Klein (with Exhibits 1, 2 and 3), and a [Proposed] Preliminary Approval Order, which includes a proposed timetable for future events.

In light of the ongoing COVID-19 pandemic and the resultant limitations on in-person hearings in the Connecticut state court system, the parties do *not* request in-person oral argument regarding this unopposed motion, and respectfully request that the Court consider this motion on the papers. If a hearing would assist the Court in reaching a determination, the parties respectfully propose setting a telephonic or videoconference (rather than in-person) hearing if such is acceptable to the Court.

WHEREFORE, Plaintiffs respectfully move for an Order:

- (1) Preliminarily approving, for settlement purposes only, the Settlement as set forth in the Settlement Agreement;

ORAL ARGUMENT NOT REQUESTED

- (2) Modifying the definition of the already-certified Class as set forth in the accompanying Memorandum of Law for Settlement purposes only;
- (3) Approving the proposed Notice Plan;
- (4) Approving the proposed schedule set forth in the [Proposed] Order
- (5) Approving Plaintiffs' uncontested Motion for Preliminary Approval of Class Action Settlement;
- (6) Appointing JND Legal Administration as the Settlement Administrator;
- (7) Approving the procedure for Opt-Outs and Objections as set forth in the Settlement Agreement;
- (8) Scheduling a Final Approval Hearing; and
- (9) Staying all proceedings in this Action other than those proceedings necessary to carry out or enforce the terms and conditions of the Settlement.

Dated: March 27, 2020

Respectfully submitted,

PLAINTIFFS

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CERTIFICATE OF SERVICE

I certify that a copy of the above was or will immediately be mailed or delivered electronically or nonelectronically on March 27, 2020, to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served.

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