

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: MOVEIT CUSTOMER DATA
SECURITY BREACH LITIGATION

MDL No. 1:23-md-03083-ADB-PGL

This Document Relates To:

1:23-cv-13014-ADB
1:23-cv-13015-ADB
1:23-cv-13026-ADB
1:23-cv-13019-ADB
1:23-cv-13018-ADB
1:23-cv-13020-ADB
1:23-cv-12524-ADB
1:23-cv-13025-ADB
1:23-cv-12736-ADB
1:24-cv-10031-ADB
1:23-cv-13077-ADB

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF PROPOSED
AMENDED CLASS ACTION SETTLEMENT**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned actions and consolidated in this MDL, hereby move this Court for entry of an Order: (1) finally approving the proposed Amended Class Action Settlement Agreement and Release (ECF No. 1294-1) between themselves and Arietis Health, LLC (“Arietis Health”) as fair, reasonable, and adequate; (2) finally certifying, for purposes of the Settlement only, the following Settlement Class:

all persons in the United States who provided their personal information and/or personal health information—including: (1) dates of birth; (2) Social Security Numbers; (3) driver’s license numbers; (4) parent’s maiden names; (5) digital signatures; (6) medical record numbers; (7i) patient account numbers; (8) Medicare numbers; (9) Medicaid numbers; (10) health insurance account and group numbers; (11) medical history information; (12) medical diagnosis information; (13) medical treatment/procedure

information; (14) medical provider information; (15) clinical information; and (16) prescription information—to Arietis, directly or indirectly, and whose personal identifying information and/or personal health information was included in files affected by the MOVEit Security Incident

(3) confirming that the notice plan approved by the Court in its December 9, 2024 Amended Preliminary Approval Order (ECF No. 1300) has been fully and sufficiently executed; (4) finally appointing Plaintiffs as Settlement Class Representatives; (5) finally appointing Lead Counsel and Liaison & Coordinating Counsel to act on behalf of the Settlement Class and the Settlement Class Representatives with respect to the Settlement; (6) entering the proposed final judgment; and (7) granting such other and further relief as may be just and appropriate.

This Motion is based upon the record in this case as well as the concurrently filed: (1) Memorandum of Law in Support of Plaintiffs' Motion for Final Approval; (2) Declaration of Gary F. Lynch in Support of Plaintiffs' Motion for Final Approval; (3) Declaration of Cameron R. Azari Regarding Notice Program and the exhibits attached thereto; and (4) the Declaration of Ashwini Kotwal in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and the exhibits attached thereto, as well as any additional materials and argument that may be presented to the Court.

DATED: March 4, 2025

Respectfully submitted,

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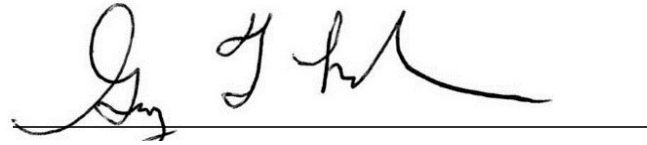
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Plaintiffs' Lead Counsel

LOCAL RULE 7.1 CERTIFICATION

I, Gary F. Lynch, pursuant to Local Rule 7.1(a)(2), hereby certify that counsel for Plaintiffs have conferred in good faith with counsel for Defendant Arietis Health LLC and Defendants do not oppose this Motion.

A handwritten signature in black ink, appearing to read "Gary F. Lynch", is written over a horizontal line. The signature is cursive and stylized.

Gary F. Lynch

CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record.

Dated: March 4, 2025

/s/ Kristen A. Johnson
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