

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

Charles Tufano, Richard Warren, and
Dave Gunton, as representatives of a
class of similarly situated persons, and
on behalf of the Pride Mobility
Employee Stock Ownership Retirement
Plan,

Plaintiffs,

v.

Pride Mobility Products Corporation
and the Pride Mobility Products
Corporation ESOP Committee,

Defendants.

Case No. 3:24-cv-00765-KM

(Hon. Karoline Mehalchick)

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

Pursuant to Federal Rule of Civil Procedure 23(e) and the Court's Order Granting Preliminary Approval of Class Action Settlement (Dkt. 40), Plaintiffs and Class Counsel respectfully move for an Order granting final approval of the Parties' proposed Class Action Settlement Agreement (Dkt. 34-1). This motion is made based on the accompanying Memorandum of Points and Authorities; the Declaration of Jennifer K. Lee in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and exhibit thereto ("Third Lee Decl."); the Declaration of Howard Shapiro in Support of Plaintiffs' Motion for Final Approval of Class

Action Settlement and exhibit thereto; the Declaration of Richard W. Simmons (“Simmons Decl.”); the previously submitted Declarations of Jennifer K. Lee, Dkts. 34 and 43; Charles Tufano, Dkt. 36; Richard Warren, Dkt. 37; and Dave Gunton, Dkt 38; the Parties’ Settlement Agreement, Dkt 34-1; the Court’s Order Granting Preliminary Approval of Class Action Settlement, Dkt 40; and all other papers, pleadings, documents, arguments, and materials presented before or during the hearing on this motion, and any other evidence or argument the Court may consider.

Respectfully Submitted,

Dated: May 15, 2025

/s/Jennifer K. Lee

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*Admitted via *Special Admission*

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 15, 2025, the foregoing was electronically filed using the CM/ECF system, causing a Notice of Electronic Filing to be transmitted to all counsel of record.

/s/Jennifer K. Lee
Jennifer K. Lee

LOCAL RULE 7.1 CERTIFICATION OF COMPLIANCE

In compliance with Local Rule 7.1, the undersigned certifies that on May 12, 2025, counsel for Plaintiffs conferred with counsel for Defendants regarding this motion and have been advised that Defendants do not oppose this motion.

Respectfully Submitted,

Dated: May 15, 2025

/s/Jennifer K. Lee

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