

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

IN RE FOREFRONT DATA BREACH
LITIGATION

This Document Relates to: ALL ACTIONS.

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Master File No. 1:21-cv-00887-LA

**PLAINTIFFS’ UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND RESPONSE TO OBJECTION**

Pursuant to Fed. R. Civ. P. 23(e), Plaintiffs Judith Leitermann, Lynn Anderson, and Milan E. Kunzelmann (collectively, “Plaintiffs”), individually and on behalf of all others similarly situated, respectfully move this Court for the entry of the proposed Final Approval Order submitted herewith, which seeks final approval of the preliminarily proposed class action settlement (the “Settlement”) and certification of a proposed settlement class (the “Settlement Class”) as defined therein. In support of this request, Plaintiffs state the following:

1. The terms of the Settlement are set forth in the Class Action Settlement Agreement and Release that was executed on August 31, 2022, attached as Exhibit 1 to Plaintiffs’ granted Motion for Preliminary Approval of the Class Action Settlement, ECF No. 57-1.

2. The relief sought in this Motion is supported by: Plaintiffs’ Memorandum of Law in Support of Their Unopposed Motion for Final Approval of the Class Action Settlement and Response to Objection (“Memorandum”); and the Declarations of Tina Wolfson, Gary M. Klinger, and Brandon Schwartz, filed concurrently herewith.

3. Defendants, Forefront Dermatology, S.C. and Forefront Management LLC, do not oppose the relief requested in this Motion.

WHEREFORE, Plaintiffs respectfully request that the Court enter the [Proposed] Order granting final approval, conditionally certifying a Settlement Class, granting final approval of the Class Action Settlement Agreement and Release, finally approving the form and manner of Notice, denying the lone objection filed with respect to the Settlement, and entering final judgment.

Dated: February 8, 2023

Respectfully submitted,

/s/ Tina Wolfson

Tina Wolfson

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Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 8, 2023, the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on the following ECF-registered counsel of record.

/s/ Tina Wolfson
Tina Wolfson