

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

IN RE: COMMUNITY HEALTH)
SYSTEMS, INC.,)
CUSTOMER SECURITY DATA)
BREACH LITIGATION)
(MDL 2595))
) MASTER FILE NO.
) 15-CV-222-KOB
)
) This document relates to all cases.
)

MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT AND CERTIFICATION OF SETTLEMENT CLASS

Plaintiffs, by and through the undersigned counsel, hereby move this Court for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) preliminarily approving the proposed settlement (a copy of the Settlement Agreement between the parties is attached to the accompanying brief as Exhibit A); (2) certifying the proposed settlement class; and (3) approving the proposed notice program. Plaintiffs request that the motion, which Community Health Systems does not oppose, be granted, because the settlement meets all of the standards for preliminary approval; the settlement class satisfies the requirements of Rule 23; and the notice program comports with both Rule 23 and due process.

This motion is based on the accompanying memorandum, exhibits, and the records, pleadings, and papers filed in this action, and such argument as may be

presented to the Court at the hearing on December 17, 2018.

Filed: December 10, 2018

Respectfully Submitted,

s/ Karen H. Riebel

Karen H. Riebel
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Ave. S., Suite 2200
Minneapolis, MN 55401
khriebel@locklaw.com

Jeff Friedman (asb-6868-n77j)
FRIEDMAN, DAZZIO ZULANAS &
BOWLING, P.C.
P. O. Box 43219
Birmingham, AL 35243-3219
jfriedman@friedman-lawyers.com

Chris Hellums
PITTMAN DUTTON & HELLUMS, PC
2001 Park Place, Ste. 1100
Birmingham, AL 35203-2716
chrish@pittmandutton.com

Attorneys for Plaintiffs