

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE WHEATON FRANCISCAN
ERISA LITIGATION

Case No. 16-cv-04232

Honorable Gary Feinerman

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT AGREEMENT**

Plaintiffs Bruce Bowen, Cheryl Mueller, and Diann Curtis (“Named Plaintiffs”), by and through their attorneys, respectfully move the Court for an Order: (1) preliminarily approving the Class Action Settlement Agreement (“Settlement” or “Settlement Agreement”) between the Parties; (2) preliminarily certifying the proposed Settlement Class pursuant to Federal Rules of Civil Procedure 23(b)(1) and/or 23(b)(2); (3) approving the form and method of Class Notice; and (4) setting a date and time for a hearing (the “Fairness Hearing”) for consideration of final approval of the Settlement, of payment of attorneys’ fees and expenses, and of a potential Incentive Award to certain Plaintiffs.

Wherefore, for the foregoing reasons, Named Plaintiffs respectfully request that the Court grant their Unopposed Motion for Preliminary Approval of Settlement Agreement.

Dated: September 1, 2017

By: /s/ Carol V. Gilden

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Interim Co-Lead Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2017, I electronically filed the foregoing with the Clerk of the Court using ECF, who in turn sent notice to all counsel of record.

Dated: September 1, 2017

/s/ Julia Horwitz
Julia Horwitz