

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

ARLENE HODGES, et al., )  
)  
Plaintiffs, ) Civil Action No.: 1:16-cv-1079 (RDB)  
)  
v. )  
)  
BON SECOURS HEALTH )  
SYSTEM, INC., et al., )  
)  
Defendants. )  
)  
\_\_\_\_\_ )

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF THE CLASS ACTION  
SETTLEMENT AGREEMENT**

Plaintiffs Arlene Hodges, Carolyn Miller, and Gary Brown (“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.

Dated: May 31, 2017

Respectfully submitted,

COHEN MILSTEIN SELLERS & TOLL PLLC

/s/ Julia Horwitz  
Julia Horwitz, MD Bar No. 19841

Karen L. Handorf (admitted *pro hac vice*)  
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*Interim Class Counsel*

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on May 31, 2017, I electronically filed the foregoing Unopposed Motion for Preliminary Approval and Memorandum in support thereof, with the Declaration of Michelle C. Yau and attachments, using the CM/ECF system, which will automatically send e-mail notification of such filing to the attorneys of record.

Dated: May 31, 2017

/s/ Julia Horwitz

Julia Horwitz