

Scott M. Lempert, NJBN 035281995
(A Member of the Bar of this Court)
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave. NW
Suite 500
Washington, DC 20005
Telephone: (202) 408-4600

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DONNA GARBACCIO, individually)	
and on behalf of all others similarly)	
situated,)	Civil Action
)	
Plaintiff,)	No. 2:16-cv-02740(JMV)(JBC)
)	
v.)	Honorable John Michael Vazquez
)	United States District Judge
ST. JOSEPH'S HOSPITAL AND)	
MEDICAL CENTER AND)	Honorable James B. Clark
SUBSIDIARIES, <i>et al.</i> ,)	United States Magistrate Judge
)	
Defendants.)	CLASS ACTION

JOINT NOTICE OF SETTLEMENT

The Parties to this action hereby give notice that they have executed a term sheet settling this matter. The term sheet contemplates that the Parties will draft and execute a comprehensive settlement agreement by July 6, 2017. Within 21 days of executing the settlement agreement, the Parties will submit that agreement to the Court along with a motion for preliminary approval.

The Parties also hereby ^{*}request that this matter, which the Court
administratively terminated on May 8, 2017 (Dkt. No. 98), be re-opened.

Dated: June 7, 2017

Respectfully submitted,

/s/ Scott M. Lempert

Scott M. Lempert, NJBN 035281995
Karen L. Handorf, *admitted pro hac vice*
Michelle C. Yau, *admitted pro hac vice*
Mary J. Bortscheller, *pro hac vice*
application pending

**COHEN MILSTEIN SELLERS
& TOLL PLLC**

1100 New York Avenue, N.W., Suite 500
Washington, DC 20005

Tel: (202) 408-4600

Fax: (202) 408-4699

Email: slempert@cohenmilstein.com

khandorf@cohenmilstein.com

myau@cohenmilstein.com

mbortscheller@cohenmilstein.com

Laura R. Gerber, *admitted pro hac vice*
Lynn Lincoln Sarko, *admitted pro hac vice*
Havila C. Unrein, *admitted pro hac vice*

KELLER ROHRBACK L.L.P.

1201 Third Avenue, Suite 3200

Seattle, WA 98101-3052

Tel.: (206) 623-1900

Fax: (206) 623-3384

Email: lgerber@kellerrohrback.com

lsarko@kellerrohrback.com

hunrein@kellerrohrback.com

Ron Kilgard, *admitted pro hac vice*

KELLER ROHRBACK L.L.P.

3101 North Central Avenue, Suite 1400

Phoenix, AZ 85012
Tel.: (602) 248-0088
Fax: (602) 248-2822
Email: rkilgard@kellerrohrback.com

Counsel for Plaintiff Garbaccio

s/Howard Shapiro
Howard Shapiro (pro hac vice)
Stacey C. S. Cerrone (pro hac vice)
PROSKAUER ROSE LLP
650 Poydras Street, Suite 1800
New Orleans, LA 70130
Telephone: (504) 310-4085
Fax: (504) 310-2022
Email: howshapiro@proskauer.com
rrachal@proskauer.com
scerrone@proskauer.com

David R. Kott
Christopher S. Mayer
McCARTER & ENGLISH, LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07101-0652
Telephone: (973) 622-4444
Fax: (973) 624-7070

Counsel for Defendants

* Clerk of the Court is directed to reopen this matter.

So Ordered:


Judge John Michael Vazquez, U.S.D.J.

6/8/2017
Date