

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

IN RE: GREYLOCK MCKINNON
ASSOCIATES DATA SECURITY
INCIDENT LITIGATION

CASE NO. 1:24-CV-10797

CONSOLIDATED CLASS ACTION

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND APPLICATION
FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS**

Plaintiffs, Tim Isaac, Mary Gregel, Theresa McFadden, Valerie Gunther, LeLand Wooten Jr., Paulette Zalewski, Dale Robertson, Albert Waddington, Dina Crocetto-Waddington, John McLaughlin, Charles McCurdy, Lynn Kohler, Richard Lilly, Daniel Jaspersen, and Michael Rosen, on behalf of themselves and the proposed Settlement Class,¹ with the consent of Defendant, Greylock McKinnon Associates, Inc., hereby move this Court for Final Approval of the class action Settlement preliminarily approved by this Court on January 31, 2025 (D.E. 48). Plaintiffs respectfully request this Court enter a Final Approval Order and thereafter a Final Judgment:

a. Granting final certification of the Settlement Class, appointing Plaintiffs as Class Representatives, and appointing as Class Counsel Raina Borrelli of Strauss Borrelli PLLC and Jeff Ostrow of Kopelowitz Ostrow P.A.

¹ All capitalized terms herein shall have the same meaning as those defined in Section II of the Settlement Agreement and Releases, which is attached to the Memorandum of Law in support of this Motion as Exhibit A.

- b. Finding the Notice Program satisfied due process requirements and Federal Rule of Civil Procedure 23;
- c. Finding the terms of the Settlement are fair, reasonable, and adequate; the Settlement was entered into after extensive, arm's-length negotiations; and the Settlement terms are approved, adopted, and incorporated by the Court;
- d. Directing the Parties, their attorneys, and the Settlement Administrator to consummate the Settlement in accordance with the Final Approval Order and the terms of the Agreement;
- e. Dismissing with prejudice all claims resolved by the Settlement, including the Released Claims, and ruling the Settlement is binding on all Settlement Class Members, including the Releases contained in the Agreement (subject to the Court retaining jurisdiction to enforce the terms of the Settlement and the Releases); and
- f. Approving Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards.

In support of this Motion, Plaintiffs submit their Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Application for Attorneys' Fees, Costs, and Service Awards, the Declaration of Class Counsel Raina Borrelli and Jeff Ostrow, the Declaration of Cameron R. Azari, Esq. of Epiq Class Action Claims & Solutions, Inc., all other pleadings and papers on file in this Action, and any oral argument that may be heard by this Court at or prior to the Final Approval Hearing currently scheduled for July 9, 2025.

Dated May 27, 2025.

Respectfully submitted,

/s/ Jeff Ostrow
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Putative Class*