

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

IN RE: GREYLOCK MCKINNON  
ASSOCIATES DATA SECURITY  
INCIDENT LITIGATION

CASE NO. 1:24-CV-10797

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

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 Jasperson, and Michael Rosen, individually and on behalf of the putative class, (collectively "Plaintiffs") move pursuant to Federal Rule of Civil Procedure 23(a), 23(b)(2), and 23(b)(3) for an Order: 1) granting Preliminary Approval of the proposed Settlement; (2) preliminarily certifying a Settlement Class for purposes of Settlement; (3) appointing Plaintiffs as Class Representatives; (4) appointing Raina Borrelli and Jeff Ostrow as Settlement Class Counsel; (5) appointing Epiq Class Action & Claim Solutions, Inc. as the Settlement Administrator; (6) approving the Parties' proposed form and method of giving Notice of the pendency of this Action and the Settlement to the Settlement Class; (7) approving the Claim Form and Claims process; (8) scheduling a Final Approval Hearing for **June 30, 2025** (or the soonest available date thereafter) for the Court to consider the request for Final Approval of the Settlement and the Application for Attorneys' Fees, Costs, and Service Awards; and (9) granting such other relief and further relief as the Court deems just and proper.

Dated: January 29, 2025

Respectfully submitted,

By: /s/ Raina C. Borrelli  
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*Interim Co-Lead Counsel for Plaintiffs and the  
Putative Class*

**CERTIFICATE OF SERVICE**

I, Raina C. Borrelli, hereby certify that on January 29, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record, via the ECF system.

DATED this 29th day of January, 2025.

STRAUSS BORRELLI PLLC

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