

COOPER CLINIC, P.A., COOPER
MEDICAL IMAGING, LLP, and
COOPER AEROBICS ENTERPRISES,
INC.,



DALLAS COUNTY, TEXAS

Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement 1

Plaintiffs' memorandum of law in support of the motion for preliminary approval; and the proposed orders and other supporting documents submitted herewith.

3. Plaintiffs state that the proposed Settlement falls within the approvable range of fair, reasonable, and adequate; satisfies the requirements of Tex. R. Civ. P. 42, *et seq.*, and should be preliminarily approved by this Court.

WHEREFORE, Plaintiffs respectfully request that the Court enter the [Proposed] Order granting preliminary approval of the class action Settlement, conditionally certifying a Settlement Class, granting preliminary approval of the Settlement Agreement, approving the form and manner of Notice, and scheduling a Final Approval Hearing.

Dated: January 23, 2025

Respectfully submitted,

/s/ William B. Federman

William B. Federman

Texas Bar No. 00794935

FEDERMAN & SHERWOOD

4131 North Central Expressway, Ste. 900

Dallas, TX 75204

Ph: 405-235-1560

wbf@federmanlaw.com

Gary M. Klinger

MILBERG COLEMAN BRYSON

PHILLIPS GROSSMAN, PLLC

227 W. Monroe Street, Suite 2100

Chicago, Illinois 60606

Tel: (866) 252-0878

gklinger@milberg.com

Bruce W. Steckler

Texas Bar No. 00785039

Steckler Wayne & Love, PLLC

12720 Hillcrest Road

Dallas, Texas 75230

Telephone: (972) 387-4040

Fax: (972) 387-4041

bruce@swclaw.com

John A. Yanchunis
Texas Bar No. 22121300
MORGAN & MORGAN COMPLEX
BUSINESS DIVISION
201 N. Franklin Street, 7th Floor
Tampa, Florida 33602
(813) 223-5505
jyanchunis@ForThePeople.com

Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF CONFERENCE

I, the undersigned attorney, hereby certify to the Court that I have conferred with opposing counsel in an effort to resolve the issues contained in this motion without the necessity of Court intervention, and opposing counsel has indicated that they do not oppose this motion.

Certified to the 23rd of January, 2025 by

/s/ William B. Federman
William B. Federman

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has been served on all counsel of record via E-File Texas on this 23rd day of January, 2025.

/s/ William B. Federman
William B. Federman