

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER VUCKOVIC, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

KT HEALTH HOLDINGS, LLC and KT
HEALTH, LLC,

Defendants.

Civil Action No. 1:15-cv-13696-GAO

**JOINT MOTION FOR PRELIMINARY APPROVAL OF PROPOSED SETTLEMENT,
PRELIMINARY CLASS CERTIFICATION, APPROVAL
OF FORM AND MANNER OF NOTICE, AND TO SET A FAIRNESS HEARING**

The parties to the above-captioned action (the “Parties”) hereby move for an order (1) preliminarily certifying the Class; (2) granting preliminary approval of the proposed Settlement; (3) approving the Parties’ proposed form and method of giving notice to the Class of the pendency of this litigation and of the Settlement; (4) directing that notice be given to the Class members as approved by the Court; (5) finding that such notice constitutes the best notice practicable under the circumstances; (6) naming Plaintiff and his counsel, David Pastor of Pastor Law Office, LLP, Preston Leonard of Leonard Law Office PC, and Nathan Zipperian, of Shepherd, Finkelman, Miller & Shah LLP, along with their respective firms, as Class Representative and Class Counsel, respectively; (7) scheduling various dates for requirements and/or obligations of the Parties and Class members as more fully described in the proposed order filed concurrently herewith; and (8) scheduling a fairness hearing during which the Court will consider (a) the Parties’ request for final approval of the Settlement and entry of the proposed Final Order and Final Judgment, (b) Class Counsel’s application for an award of attorneys’ fees and reimbursement of expenses, and (c) dismissal of the Action pending before this Court.

The grounds for this Motion are set forth in the accompanying memorandum of law.

Dated: May 24, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants on May 24, 2017.

/s/ David Pastor _____
David Pastor