

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE SHIELDS HEALTH GROUP, INC  
DATA BREACH LITIGATION

CASE NO. 1:22-cv-10901-PBS

Hon. Patti B. Saris

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

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs James Buechler, Julie Colby, John Kennedy, Sharon Pimental, and Cindy Tapper (“Federal Plaintiffs” or “Plaintiffs”), respectfully move this Court for entry of an Order: (1) finally approving proposed Class Action Settlement Agreement resolving their claims against Defendant Shields Health Care Group, Inc. as fair, reasonable, and adequate; (2) finally certifying, for purposes of the Settlement only, the following Settlement Class:

All persons in the United States that Shields identified as potentially having their Personal Information impacted by the Data Incident that are residents of any U.S. State, U.S. territory, or the District of Columbia, other than Massachusetts.

The Settlement Class specifically excludes: (1) any Judge or Magistrate Judge presiding over the Litigation, any members of the Judges’ respective staffs, and immediate members of the Judges’ respective families; (2) officers, directors, members, and shareholders of the Defendant; (3) persons in the Federal Action Settlement Class who timely and validly request exclusion from and/or opt-out of the Settlement Class and the successors and assigns of any such excluded persons; (4) any persons whose claims in this matter have been finally adjudicated on the merits or otherwise released; (5) Parties’ Counsel; and (6) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the criminal activity or occurrence of the Data Incident or who pleads nolo contendere to any such charge.

(3) confirming that the notice plan approved by the Court in its September 9, 2025 Preliminary Approval Order (ECF No. 165) has been effectuated; (4) finally appointing Federal Plaintiffs as the Federal Action Settlement Class Representatives; (5) finally appointing Settlement Class

Counsel to act on behalf of the Settlement Class and the Settlement Class Representatives with respect to the Settlement; (6) entering the proposed final judgment; and (7) granting such other and further relief as may be just and appropriate.

This motion is based on the Memorandum of Law filed herewith, the declarations and documents submitted in support, and other relevant parts of the record.

Dated: December 9, 2025

Respectfully submitted,

/s/ Brendan Jarboe

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*Settlement Class Counsel*

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that counsel for Plaintiffs conferred with counsel for Defendant regarding this motion and Defendant assents to Plaintiffs' request.

/s/ Brendan Jarboe  
Brendan Jarboe

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2025, a copy of this motion was filed electronically and served on all counsel of record through the electronic filing system.

/s/ Brendan Jarboe  
Brendan Jarboe