

Docketed 12/11/2025

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

**CONSTANTINE KOSSIFOS, on behalf of
himself and all others similarly situated,**

Plaintiff,

v.

**SHIELDS HEALTH CARE GROUP,
INC.,**

Defendant.

**SUPERIOR COURT
TRIAL COURT DEPARTMENT**

CASE NO. 2282-cv-00561

CONSOLIDATED WITH:

ESSEX, ss.

**AMANDA JOHNSON, CHRISTINE
CAMBRIA, COURTNEY HORGAN, and
KENNETH VANDAM, on behalf of
himself and all others similarly situated,**

Plaintiff,

v.

**SHIELDS HEALTH CARE GROUP,
INC.,**

Defendant.

**SUPERIOR COURT
TRIAL COURT DEPARTMENT**

CASE NO. 2277-cv-00839

NORFOLK, ss.

**WILLIAM BISCAN, TENNIE KOMAR,
and LISA SMITH, on behalf of himself and
all others similarly situated,**

Plaintiff,

v.

**SHIELDS HEALTH CARE GROUP,
INC.,**

Defendant.

**SUPERIOR COURT
TRIAL COURT DEPARTMENT**

CASE NO. 2382-cv-0023

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

Pursuant to Rule 23 of the Massachusetts Rules of Civil Procedure, Plaintiffs Constantine Kossifos, William Biscan, Tennie Komar, Lisa Smith, Amanda Johnson, Christine Cambria, Courtney Horgan, Kenneth Vandam, Peter Shea, and Maria Melo ("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 residing in Massachusetts that Shields identified as potentially having their Personal Information impacted by the Data Incident.

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) any persons whose claims in this matter have been finally adjudicated on the merits or otherwise released; (4) Parties' Counsel; and (5) 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 11, 2025 Preliminary Approval Order (Dkt. 47) has been effectuated; (4) finally appointing State Plaintiffs as the State 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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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 and by electronic mail.

/s/ Brendan Jarboe
Brendan Jarboe