

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

T.R. et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.: 4:24-cv-00704-SRB
	)	
CLAY-PLATTE FAMILY MEDICINE	)	
CLINIC, P.C., et al.,	)	
	)	
Defendants.	)	
	)	

PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs respectfully move the Court for an Order: (1) finally approving the class action Settlement embodied in the April 6, 2026 Settlement Agreement and Release (Doc. #82-1) (the “Agreement” or “Settlement”) as fair, reasonable, and adequate under Federal Rule of Civil Procedure 23(e); (2) finally certifying the Settlement Class for settlement purposes under Rules 23(a) and 23(b)(3); (3) confirming the Named Plaintiffs as Settlement Class Representatives; (4) appointing J. Austin Moore of Stueve Siegel Hanson LLP, Maureen M. Brady of McShane & Brady, LLC, and Phyllis A. Norman of Norman & Graves LLC as Class Counsel under Rule 23(g); and (5) entering final judgment dismissing the Action with prejudice in accordance with the Settlement.

In support of this Motion, Plaintiffs submit herewith their Suggestions in Support and the Declaration of Stephanie Saunders of Angeion Group, LLC Regarding Implementation of the Notice Plan and Settlement Administration (the “Saunders Declaration”). Plaintiffs are also submitting by email to the Court a Proposed Final Approval Order and a separate Proposed Final Judgment.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion, grant their pending Motion for Attorneys' Fees, Expense Reimbursement, and Service Awards (Doc. #89), and enter a Final Approval Order and Final Judgment.

Dated: September 15, 2026

Respectfully submitted,

/s/ J. Austin Moore

J. Austin Moore, MO Bar #64040

STUEVE SIEGEL HANSON LLP

460 Nichols Road, Suite 200

Kansas City, Missouri 64112

Telephone: (816) 714-7100

moore@stuevesiegel.com

Maureen M. Brady, MO Bar #57800

MCSHANE & BRADY, LLC

4006 Central St.

Kansas City, Missouri 64111

Telephone: (816) 888-8010

mbrady@mcsbanebradylaw.com

Phyllis A. Norman, MO Bar #55887

NORMAN & GRAVES LLC

4505 Madison Avenue, Suite 220

Kansas City, Missouri 64111

(816) 895-8989

phyllis@ngkclaw.com

Interim Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2026, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system, and therefore, will be transmitted to all counsel of record by operation of the Court's CM/ECF system.

By: /s/ J. Austin Moore