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THE STATE OF NEW HAMPSHIRE

ROCKINGHAM COUNTY SUPERIOR COURT

SEAN SKILLINGS, MAUREEN MARCH, CHRISTINE WILLIS, JAMES GIGUERE, CAMERON LAFONTAINE and E.B., a minor, by and through her guardian, SARAH BARR, and E.B., a minor, by and through her guardian, AMBER BASETT, individually, and on behalf of all others similarly situated;

v.

ACCESS SPORTS MEDICINE AND ORTHOPAEDICS, PLLC,

Docket No. 218-2024-CV-01086

PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs Sean Skillings, Maureen March, Christine Willis, James Giguere, Cameron Lafontaine, E.B., a minor, by and through her guardian, Sarah Barr, an E.B., a minor, by and through her guardian, Amber Basett, individually and on behalf of others similarly situated ("Plaintiffs"), hereby move this Court to:

1. Preliminarily approve the settlement described in the "Settlement Agreement" between Plaintiffs and Defendant Access Sports Medicine and Orthopaedics, PLLC ("Defendant") and the attachments thereto. A true and correct copy of the Settlement Agreement ("Agreement" or "SA") is attached to the Joint Declaration of Class Counsel in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement as Exhibit 1. Included with the Agreement are the following sub-exhibits:

Exhibit A: Short-Form Notice

Exhibit B: Long-Form Notice

Exhibit C: Claim Form

Exhibit D: [Proposed] Preliminary Approval Order

2. Conditionally certify the Settlement Class;

3. Appoint Plaintiffs Sean Skillings, Maureen March, Christine Willis, James Giguere, Cameron Lafontaine, E.B., a minor, by and through her guardian, Sarah Barr, and E.B., a minor, by and through her guardian Amber Basett, as Settlement Class Representatives;

4. Appoint Scott Edward Cole of Cole & Van Note, Philip J. Krzeski of Chestnut Cambronne, PA, and Gary Klinger of Milberg PLLC as Settlement Co-Lead Class Counsel;

5. Approve a customary Short-Form Notice to be mailed to Settlement Class Members (the "Short-Form Notice") in a form substantially similar to that attached as Exhibit A to the Settlement Agreement;

6. Approve a customary long form notice ("Long-Form Notice") to be posted on the Settlement Website in a form substantially similar to the one attached as Exhibit B to the Settlement Agreement;

7. Direct Notice to be sent to the Settlement Class Members in the form and manner proposed as set forth in the Settlement Agreement and Exhibits A and B thereto;

8. Appoint Angeion Group as Settlement Administrator;

9. Approve the use of a claim form substantially similar to that attached as Exhibit C to the Settlement Agreement; and

10. Set a hearing date and schedule for final approval of the Settlement and consideration of Settlement Class Counsel's motion for award of fees, costs, expenses, and service awards.

This Motion is based upon: (1) this Motion; (2) the Memorandum in Support of the Unopposed Motion for Preliminary Approval of Class Action Settlement; (3) the Joint Declaration

of Class Counsel, filed herewith; (4) the Settlement Agreement; (5) the Notices of Class Action Settlement (including Long-Form and Short-Form Notices); (6) the Claim Form; (7) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement; (8) the [Proposed] Final Approval Order; (9) the records, pleadings, and papers filed in this action; and (10) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion. This Motion is unopposed.

Dated: September 14, 2026

By: /s/ Biron L. Bedard

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**Pro hac vice forthcoming*