

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRADLEY J. MCLACHLAN and ALEX D. GRAHAM, individually and on behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO.:
	)	2:22-cv-04115
v.	)	
	)	
THE BOARD OF TRUSTEES OF THE ELEVATOR CONSTRUCTORS ANNUITY AND 401(K) RETIREMENT PLAN and JOHN DOES 1-30.	)	
	)	
Defendants.	)	

**PLAINTIFFS BRADLEY J. MCLACHLAN AND ALEX D. GRAHAM’S
UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT, APPROVAL OF FORM AND MANNER OF CLASS
NOTICE, AND SCHEDULING OF FAIRNESS HEARING**

Plaintiffs, Bradley J. McLachlan and Alex D. Graham’s (together, “Plaintiffs”), participants in the Elevator Constructors Annuity and 401(k) Retirement Plan (the “Plan”), respectfully submit this Unopposed Motion for Preliminary Approval of Class Action Settlement Agreement entered into with Defendant¹ (the “Settlement” or “Settlement Agreement”), Approval of Form and Manner of Class Notice, and Scheduling of Fairness Hearing and respectfully move this Court for an Order granting the relief sought. The grounds for this motion are set forth in Plaintiffs and their Counsel’s declarations and the memorandum of law in support of this motion, which are submitted contemporaneously herewith.

¹ “Defendant” refers to The Board of Trustees of the Elevator Constructors Annuity and 401(k) Retirement Plan (the “Board”).

A Proposed Order is submitted herewith.

Dated: August 22, 2024

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

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Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2024, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.