

COMMONWEALTH OF MASSACHUSETTS

BRISTOL, ss

SUPERIOR COURT

ROBERT WOODWARD and TIMOTHY KING, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

NORTH COTTAGE PROGRAM, INC.,

Defendant.

Case No. 2473CV00710

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

Plaintiffs Robert Woodward and Timothy King ("Plaintiffs") hereby move this Court for final approval of the class action settlement preliminarily approved by this Court on April 30, 2026. Plaintiffs respectfully request that this Court:

- a. Grant final certification of the Settlement Class for settlement purposes, appoint Plaintiffs Robert Woodward and Timothy King as Class Representatives, and appoint Cassandra P. Miller of Strauss Borrelli PLLC, Leigh S. Montgomery of EKSM, LLP, and Michael S. Appel of Ketterer, Browne & Associates, LLC as Settlement Class Counsel;
- b. Grant final approval of the Settlement;
- c. Find that the Notice has been provided in accordance with the Court-approved notice plan and due process;
- d. Grant Plaintiffs' Motion for Award of Attorneys' Fees, Costs, Expenses, and Service Awards;

- e. Dismiss with prejudice Plaintiffs' and Settlement Class Members' claims against North Cottage Program, Inc., relating to the Data Incident;
- f. Reserve jurisdiction over the Settlement for enforcement of its terms;
- g. Issue the Proposed Final Approval Order.¹

This Motion is based on the Supporting Memorandum filed herewith; the Declaration of Angeion Group, LLC in Connection with Final Approval of Settlement; the supporting Joint Declaration of Class Counsel; Plaintiffs' Motion for Award of Attorneys' Fees, Costs, Expenses, and Service Awards and accompanying documents; all other pleadings and papers on file in this action; and any oral argument that may be heard by this Court at the Final Approval Hearing currently scheduled for September 16, 2026.

Plaintiffs' counsel are not aware of any objections to this Settlement.

The Parties conferred pursuant to Rule 9A, and Defendant assents to the relief sought by this motion.

Wherefore, Plaintiff requests that this Court grant this motion, and also grant the motion for attorneys' fees, costs, expenses, and service awards.

Dated: September 2, 2026

Respectfully submitted,

/s/ Michael S. Appel
Michael S. Appel (BBO# 543898)
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¹ A copy of the Proposed Final Approval Order is annexed hereto as **Exhibit A**.

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*Attorneys for Plaintiffs and the Proposed
Settlement Class*

CERTIFICATE OF SERVICE

I, Michael Appel, attorney for the Plaintiffs, hereby certify that on September 2, 2026, I served true copies of the above document upon all counsel of record via the Court's electronic filing system.

Dated: September 2, 2026

Respectfully submitted,

/s/ Michael Appel
Michael S. Appel (BBO# 543898)