UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)

DAVID STARR, BERNADETTE MAVRIKOS, EDMUND QUIAMBAO, JAMES TETTENHORST, JEREMY HANSEN, KRISTA KARO, ARLENE REED-COSSAIRT, PETER STAVROS, HEATHER FARKAS, on behalf of themselves and all others similarly situated, Plaintiffs, v. VSL PHARMACEUTICALS, INC.; LEADIANT BIOSCIENCES, INC., F/K/A SIGMA-TAU PHARMACEUTICALS, INC.; and ALFASIGMA USA, INC., Defendants.	No. 8:19-cv-02173-LKG

PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS <u>ACTION SETTLEMENT</u>

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs and Class Representatives David Starr, Bernadette Mavrikos, Edmund Quiambao, James Tettenhorst, Jeremy Hansen, Krista Karo, Arlene Reed-Cossairt, Peter Stavros and Heather Farkas (collectively, "Plaintiffs"), by and through undersigned counsel, respectfully move this Court for entry of an order[1] preliminarily approving the parties' proposed class action settlement. Defendants do not oppose this motion for preliminary approval.

[1] A proposed preliminary approval order is being submitted contemporaneously with this Motion.

As set forth in the accompanying memorandum in support of this motion, Defendants have agreed to pay a total of $20 million to settle this class action. That $20 million will create a common fund to pay claims made by Class Members, legal fees and expenses of Class Counsel and service awards to the Plaintiffs, as approved by the Court, and the costs of providing notice and administering the Settlement. If the Settlement is approved, under no circumstances would any of the $20 million be returned to the Defendants. The Settlement will provide for substantial cash benefits to Class Members.

The Settlement will bring to a close this long and hard-fought litigation. The Settlement is the product of vigorous, good-faith, arm's-length negotiations between experienced counsel, including at mediation. The Settlement represents a favorable recovery for the Class that falls well within the range of approval for such class actions and satisfies all of the factors required by Federal Rule of Civil Procedure 23(e) and Fourth Circuit precedent.

WHEREFORE, for the foregoing reasons and those set forth in the accompanying memorandum, Plaintiffs respectfully request that the Court: (1) preliminarily approve the parties' proposed Settlement; (2) certify a Settlement Class that is the same as the "Nationwide Class" this Court previously certified, adding only some agreed upon exclusions from the certified Nationwide Class; (3) approve the form and content of the proposed notices to the Class; (4) find that the proposed procedures for distribution of the notices constitute the best notice practicable under the circumstances and comply with due process and Rule 23; (5) set deadlines for Class Members to request exclusion from the Class or object to the Settlement; (6) set a date and time for the Settlement Hearing, at which the Court will consider final approval of the Settlement, the plan of distribution, Class Counsel's application for attorneys' fees and litigation expenses and the request for service awards to the Plaintiffs; and (7) appoint Angeion Group, LLC as the claims administrator.

Dated: March 31, 2026

Respectfully submitted,

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