

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

JODDA MOORE, and TERRELL AIKEN,
individually and on behalf of all similarly
situated persons,

Plaintiffs,

v.

INDEPENDENCE BLUE CROSS, LLC d/b/a
INDEPENDENCE BLUE CROSS,

Defendant.

No. 2:23-cv-00566

(Judge Scott)

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

Plaintiffs, Jodda Moore and Terrell Aiken, by and through their counsel, Mobilio Wood, and Cohn Lifland Pearlman Herrmann & Knopf LLP, respectfully request that this Honorable Court enter an Order: (1) certifying the Settlement Class¹ pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3), for settlement purposes only; (2) granting final certification of the Settlement Collective pursuant to Section 216(b) of the Fair Labor Standards Act, for settlement purposes only; (3) granting final approval of the proposed settlement; (4) appointing Mobilio Wood, and Cohn Lifland Pearlman Herrmann & Knopf LLP, as Class Counsel; (5) approving Plaintiffs' requested service awards; (6) approving Class Counsel's requested attorneys' fees and costs; and (7) approving the Administrator's requested fees.

¹ Capitalized terms not otherwise defined in this Order shall have the same meaning as ascribed to them in the parties Settlement Agreement and Release ("Settlement Agreement"). See (Doc. 31-1).

In support of this motion, Plaintiffs rely on their Brief in Support of Plaintiffs' Unopposed Motion for Final Approval of Class and Collective Action Settlement, filed contemporaneously herewith.

Respectfully submitted,

Date: 10/8/2024

BY: /s/ Peter C. Wood, Jr.
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*Co-Counsel for Plaintiffs Jodda Moore
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Date: 10/8/2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of October, 2024, the foregoing Unopposed Motion for Final Approval of Class and Collective Action Settlement was electronically filed and served on the following counsel of record via the Court's ECF system:

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Date: 10/8/2024

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CERTIFICATION OF UNCONTESTED MOTION

Pursuant to Local Rule 7.1, the undersigned hereby certifies that Plaintiffs' counsel conferred with counsel for Defendant prior to filing Plaintiff's Unopposed Motion for Final Approval of Class and Collective Action Settlement, and that Defendant does not oppose the relief sought in Plaintiffs' motion.

Date: 10/8/2024

BY: /s/ Peter C. Wood, Jr.

Peter C. Wood, Jr., Esq. (ID No. 310145)

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