

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

MARIA ALEJANDRA CELIMEN SAVINO,  
JULIO CESAR MEDEIROS NEVES, and all  
those similarly situated,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617 WGY

**ORAL ARGUMENT REQUESTED**

**JOINT MOTION TO PRELIMINARILY APPROVE SETTLEMENT, APPROVE CLASS  
NOTICE, AND SCHEDULE FAIRNESS HEARING**

Plaintiffs and Defendant, pursuant to Fed. R. Civ. P. 23(e), hereby respectfully request that the Court enter an order substantially in the form of the Proposed Order attached to the Settlement Agreement filed concurrently herewith: (1) preliminarily approving the Settlement Agreement; (2) approving the Parties' proposed notice to class members ("Notice") (Exhibit D to the Settlement Agreement), which Notice Plaintiffs' counsel shall effectuate not later than three (3) days after the Court enters an order granting this Motion; and (3) scheduling a fairness hearing ("Fairness Hearing") no later than twenty-eight (28) days from the date this Motion is filed, at which the Parties will ask the Court to issue final approval of the Agreement. As grounds for this motion, Plaintiffs and Defendant rely on their concurrently filed Memorandum of Law in Support.

April 6, 2021

Respectfully submitted,

MARIA ALEJANDRA CELIMEN SAVINO,  
JULIO CESAR MEDEIROS NEVES

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/s/ Oren Sellstrom

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\* Motion for law student appearance pending.

♦ Motion for law student appearance forthcoming.

\*\* *Pro hac vice* forthcoming

STEVEN J. SOUZA

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Date: April 6, 2021

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2) counsel for the parties have conferred regarding this Motion, and jointly request the relief requested herein.

/s/ Oren Sellstrom

Oren Sellstrom

**CERTIFICATE OF SERVICE**

I, Oren Sellstrom, hereby certify that a true and accurate copy of this document was served via ECF to all registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as nonregistered participants on April 6, 2021.

/s/ Oren Sellstrom

Oren Sellstrom