

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

LINDA A. WOZNICKI, individually,
and as representative of a Class of
Participants and Beneficiaries
of the Aurora Health Care, Inc.
Incentive Savings Plan,

Plaintiff,

Case No. 2:20-cv-1246-BHL

v.

AURORA HEALTH CARE, INC., *et al.*

Defendants

PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Plaintiff Linda A. Woznicki ("Plaintiff") respectfully moves the Court to: (1) preliminarily approve the Parties' Class Action Settlement Agreement in the above-referenced matter; (2) approve the proposed Settlement Notices and authorize distribution of the Notices to the Settlement Class; (3) preliminarily certify the Settlement Class for settlement purposes; (4) schedule a final approval hearing; and (5) enter the accompanying Preliminary Approval Order.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M. Secunda and exhibits attached thereto (including the

Settlement Agreement attached as **Exhibit 1**), the Declaration of Linda A. Woznicki, and all files, records, and proceedings in this matter. Defendants join in the relief requested by Plaintiff's Motion for Preliminary Approval of Settlement. However, Defendants do not agree with the averments, statements, allegations, and claims stated by Plaintiff in the Motion for Preliminary Approval of Settlement and the attached Exhibits.

Dated this 21st of November, 2022

WALCHESKE & LUZI, LLC

s/ Paul M. Secunda

Paul M. Secunda

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2022, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: November 21, 2022

s/Paul M. Secunda

Paul M. Secunda