

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

AUBREY SREDNICKI, individually, and on behalf
of all others similarly situated,

Plaintiffs,

- against -

CIGNA HEALTH AND LIFE INSURANCE
COMPANY,

Defendant.

Case No. 3:23-cv-00243

CLASS ACTION

**PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT, CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASS, APPROVAL OF SETTLEMENT NOTICE
AND SCHEDULING OF FINAL APPROVAL HEARING**

Plaintiff Aubrey Srednicki, individually and on behalf of the Settlement Class (as defined in the Settlement Agreement, submitted as Exhibit A to the accompanying Declaration of William H. Narwold), respectfully moves this Court for preliminary approval of a class action settlement and related relief (as set forth below). Specifically, as set forth in the accompanying Memorandum of Law, Plaintiff respectfully moves the Court for entry of an order:

- (1) Preliminarily approving the Settlement as set forth in the Settlement Agreement;
- (2) Preliminarily certifying the Settlement Class;
- (3) Preliminarily appointing Plaintiff Aubrey Srednicki as the Settlement Class Representative;

- (4) Preliminarily appointing William H. Narwold, Meghan S.B. Oliver, and Charlotte Loper of Motley Rice LLC; and Robert A. IZARD, Craig A. Raabe, Seth R. Klein, and Christopher M. Barrett, of IZARD Kindall & Raabe LLP; as Plaintiff’s Counsel;
- (5) Approving the proposed Settlement Notice;
- (6) Appointing Rust Consulting as Settlement Administrator;
- (7) Scheduling a Final Approval Hearing; and
- (8) Staying all other proceedings in this *Srednicki* action except those related to the Final Approval Hearing.

In connection with Preliminary Approval, Plaintiffs respectfully request that the following schedule be set:

<u>EVENT</u>	<u>SCHEDULED DATE</u>
Notice mailing deadline	42 days after entry of Preliminary Approval Order (Settlement Agreement at ¶¶ 5.2, 5.3)
Briefs in support of (i) Final Approval and of (ii) Attorneys’ Fees and Costs	75 days after entry of Preliminary Approval Order
Last day for Class Members to opt-out of Settlement	91 days after entry of Preliminary Approval Order (Settlement Agreement at ¶ 8.1)
Last day for objections to the Settlement to be filed with the Court	91 days after entry of Preliminary Approval Order (Settlement Agreement at ¶ 8.2)
Parties file responses to any filed objections	105 days after entry of Preliminary Approval Order
Final Approval Hearing	At the convenience of the Court, not less than 120 days after entry of Preliminary Approval Order (Settlement Agreement at ¶ 5.3)

In support of this Motion, Plaintiffs have filed a Memorandum of Law, a supporting affidavit by William H. Narwold (including the Settlement Agreement and other Exhibits), and a proposed Preliminary Approval Order (attached hereto as Exhibit A).

Dated: February 24, 2023

Respectfully submitted,

/s/ Robert A. Izard

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