UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

LISA KWESELL; CHRISTINE : CIVIL ACTION NO.:

TURECEK; AND JASON SCHWARTZ, :

individually and on behalf all others : 3:19-cv-01098 (KAD)

similarly situated, :

•

Plaintiffs,

: CLASS ACTION

v. :

:

YALE UNIVERSITY, :

:

Defendant.

PLAINTIFFS' UNOPPOSED MOTION TO GRANT PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs Lisa Kwesell, Christine Turecek, and Jason Schwartz, individually and on behalf of all others similarly situated, will, and hereby do, move this Court for an Order: (i) preliminarily approving the proposed settlement of this proposed class action, (ii) preliminarily certifying a settlement class, (iii) approving the form and manner of notice; and (iv) setting a date for a Final Approval Hearing regarding this settlement.

This Motion is made on the grounds that the Settlement is the product of arms-length and good-faith negotiations, and is fair, reasonable, and adequate to the Class. This Motion is based on the accompanying Memorandum of Law and supporting exhibits and any oral or documentary evidence presented at the hearing on the Motion. Defendant, Yale University, does not oppose this motion.

Date: March 4, 2022 Respectfully Submitted,

/s/ Dara S. Smith

Dara S. Smith (pro hac vice)

Elizabeth Aniskevich (pro hac vice)

Daniel B. Kohrman (pro hac vice)
AARP FOUNDATION
601 E Street, NW
Washington, DC 20049
Tel: (202) 434-6280
Fax: (202) 434-6424
dsmith@aarp.org
eaniskevich@aarp.org

Joshua R. Goodbaum (ct28834) Joseph D. Garrison (ct04132) GARRISON, LEVIN-EPSTEIN, FITZGERALD, & PIRROTTI, P.C. 405 Orange Street New Haven, CT 06511 Tel: (203) 777-4425 Fax: (203) 776-3965 jgoodbaum@garrisonlaw.com jgarrison@garrisonlaw.com

Counsel for Plaintiffs

dkohrman@aarp.org

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of March, 2022, a copy of the foregoing was filed

electronically and served by mail on anyone unable to accept electronic filing. Notice of this

filing will be sent by email to all parties by operation of the Court's electronic filing system and

by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic

Filing. Parties may access this filing through the Court's CM/ECF System.

By: /s/ Dara S. Smith

Dara S. Smith

3