

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON DIVISION

JOSEPH SANNUTTI	:	
and	:	
JOHN HOLAHAN	:	
and	:	
BRADLEY GALE	:	Civil Action No.: 21-10955 (FLW)(DEA)
and	:	
MICHAEL LANGE	:	
and	:	
ANDREW DESARNO	:	
and	:	
KATHERINE JABLONSKI	:	
and	:	
GISELLE VARGAS	:	
and	:	
NELSON RAMIREZ	:	
and	:	
TIMOTHY QUICK	:	
and	:	
MALCOME LAPONE	:	
and	:	
KEITH LOCASCIO	:	
and	:	
MATTHEW COLOMBO	:	
and	:	
KRISTINE KAVANAUGH	:	
and	:	
DAVID BUBAR	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
W.B. MASON CO., INC.	:	
and	:	
LEO MEEHAN, <i>individually</i>	:	
and	:	
CHRIS MEEHAN, <i>individually</i>	:	
And	:	
ROGER AHFELD, <i>individually</i>	:	
	:	
Defendants.	:	

**PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Michael Lange (“Lange”), Andrew DeSarno (“DeSarno”), Joseph Sannutti (“Sannutti”), John Holahan (“Holahan”), Bradley Gale (“Gale”), Timothy Quick (“Quick”), Malcolm Lapone (alternatively referred to in company records by his former name, Malcolm Scott Bertram, Jr., and referred to herein as “Lapone”), Matthew Colombo (“Colombo”), Keith Locascio (“Locascio”), Kristine Kavanaugh (“Kavanaugh”), David Bubar (“Bubar”), Katharine Jablonski (“Jablonski”), Giselle Vargas (“Vargas”) and Nelson Ramirez (“Ramirez”), by and through their undersigned counsel, and pursuant to Fed. R. Civ. P. 23, hereby move this Court for entry of an order granting preliminary approval of the Parties’ proposed class action settlement. In support of this Motion, Plaintiffs state as follows:

1. On August 31, 2022, the Parties reached a global resolution as to all claims against Defendants, as asserted in the following actions, which have since been consolidated via an amended complaint filed in this Court as a part of the global resolution reached: (1) *Michael Lange, et al. v. W.B. Mason Co, Inc., et al.*, 21-cv-10955, D. N.J. (the “New Jersey Action”); (2) *Joseph Sannutti, et al. v. W.B. Mason Co, Inc., et al.*, 21-cv-02436, E.D. P.A. (the “Pennsylvania Action”); (3) *Timothy Quick, et al. v. W.B. Mason Co, Inc., et al.*, INDEX NO. 652346/2021, Supreme Ct., N.Y. (the “New York State Action”); and (4) *Katherine Jablonski, et al. v. W.B. Mason Co, Inc., et al.*, 21-cv-02436, E.D. N.Y. (the “New York Federal Action”) (collectively, the “Actions”).

2. The Parties negotiated this settlement and the proposed Class Action Settlement Agreement (“Settlement Agreement”) memorializing such terms, following arm’s length negotiations and to resolve a bona fide dispute under the labor laws, wage and hour laws, and common laws of the States of New Jersey, New York and Pennsylvania.

3. For the reasons detailed in the accompanying supporting Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (the "Memorandum"), the Settlement Agreement and its terms are fair, reasonable, and adequate under applicable legal standards and provide reasonable monetary relief to the Class Members.

4. The Parties also submit for the Court's consideration their Memorandum, which has been filed contemporaneously with this Motion.

WHEREFORE the Parties respectfully request that the Court grant their Joint Motion for Preliminary Approval of Class Action Settlement and:

- grant preliminary approval of the proposed Settlement Agreement, attached as Exhibit A to the Memorandum;
- approve the proposed Class Notice of Proposed Settlement of Class Action Lawsuit, attached to the Memorandum as Exhibit A 1;
- authorize mailing of the Settlement Notices in the manner set forth in the Settlement Agreement;
- schedule a final approval hearing between 100 and 125 days after the date of Preliminary Approval; and
- enter the Proposed Order Certifying Class for Settlement Purposes Only, Granting Preliminary Approval of Class Action Settlement, filed herewith.

Dated: January 25, 2023

By: /s/ Ari. R. Karpf

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Christine E. Burke, certify that, on January 25, 2023, the foregoing **Plaintiffs' Motion for Preliminary Approval of Class Action Settlement** was served on all counsel of record via the Court's ECF system.

/s/ Christine E. Burke

Christine E. Burke, Esq.