

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM McGEE and LEE McGEE,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

CONSTANT CONTACT, INC., et al.,

Defendants.

) No. 1:15-cv-13114-MLW

) CLASS ACTION

) LEAD PLAINTIFF'S NOTICE OF MOTION
) AND MOTION FOR FINAL APPROVAL OF
) CLASS ACTION SETTLEMENT,
) APPROVAL OF THE PLAN OF
) ALLOCATION, AND CERTIFICATION OF
) THE CLASS FOR SETTLEMENT
) PURPOSES

PLEASE TAKE NOTICE that on May 27, 2020, at 2:00 p.m. at the United States District Court for the District of Massachusetts, at the John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston, MA 02210, Lead Plaintiff North Collier Fire Control and Rescue District Firefighter Pension Plan, on behalf of the proposed Class, will respectfully move this Court, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for entry of orders: (a) granting final approval of the proposed Settlement; and (b) approving the proposed Plan of Allocation.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Lead Plaintiff submits and is filing herewith: the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement, Approval of the Plan of Allocation, and Certification of the Class for Settlement Purposes; the Declaration of Stephen R. Ashley in Support of: (A) Lead Plaintiff's Motion for Final Approval of Settlement and Approval of Plan of Allocation, and (B) Lead Counsel's Motion for Attorneys' Fees and Payment of Litigation Expenses, Charges and Costs; and the Declaration of Ross D. Murray.

Proposed orders will be submitted with Lead Plaintiff's reply submission on May 13, 2020.

DATED: March 30, 2020

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
DARREN J. ROBBINS (*pro hac vice*)
ELLEN GUSIKOFF STEWART (*pro hac vice*)

s/ Ellen Gusikoff Stewart

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Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 30, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Court's Electronic Mail Notice List, and I hereby certify that I have caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Court's Manual Notice List.

/s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART