

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

SARA RILEY,)
individually and on behalf of all others)
similarly situated,)

Plaintiff,)

v.)

CENTERSTONE OF AMERICA, INC.,)
CENTERSTONE OF INDIANA, INC., and)
CENTERSTONE OF TENNESSEE, INC.,)

Defendants.)

Case No. 3:22-cv-00662

Judge William F. Campbell, Jr.

Magistrate Judge Alistair Newbern

**PLAINTIFF’S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

NOW COMES Plaintiff Sara Riley (“Plaintiff”), through her undersigned counsel, who hereby moves this Honorable Court, pursuant to Federal Rule of Civil Procedure 23, for entry of an Order preliminarily approving the class action settlement reached between the Parties in this matter.

Pursuant to the terms of the Settlement Agreement, submitted herewith, Defendants Centerstone of America Inc., Centerstone of Indiana, Inc., and Centerstone of Tennessee, Inc. (collectively “Centerstone” or “Defendants”) shall provide significant relief to the Settlement Class Members, who were victims of a data breach of Centerstone’s files between November 2021 and February 2022. As part of the Settlement, Settlement Class Members who submit a valid claim form to the Settlement Administrator will be provided with compensation for ordinary losses, compensation for extraordinary losses, and identity theft monitoring services.

Because the Settlement is fair, reasonable, and adequate, and because the proposed Settlement Class meets all of the requirements to be conditionally certified under Fed. R. Civ. P. 23, Plaintiffs request that the Court enter an Order (1) granting their motion for preliminary approval of the proposed Settlement; (2) conditionally certifying the Settlement Class; (3) appointing Plaintiff

Sara Riley as Class Representative; (4) appointing Mason A. Barney of Siri & Glimstad LLP as Class Counsel; (5) approving the form and content of the proposed notice and ordering that the requested notice plan be effectuated; (6) appointing Postlethwaite & Netterville as Settlement Administrator; (7) scheduling a final approval hearing; and (8) providing such other and further relief as the Court deems reasonable and just.

Plaintiff's motion is also based on her concurrently-filed Memorandum of Law in Support, including the Settlement Agreement and its Exhibits and the Declarations of proposed Class Counsel; any other papers on file in this matter; and upon evidence or argument that may be presented at or before any hearing on this motion.

Dated: May 15, 2023

Respectfully submitted,

By: /s/ Mason A. Barney

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Counsel for Plaintiffs and Proposed Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on May , 2023, a true and correct copy of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement was served on all counsel of record via the Court's ECF system.

/s/ Mason A. Barney