

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DOMINIC OLIVEIRA,
on his own behalf and on behalf of
all others similarly situated,

Plaintiffs,

v.

NEW PRIME INC.,

Defendant.

Civil Action No. 1:15-cv-10603-PBS

ROCKY L. HAWORTH,
on his own behalf and on behalf of
all others similarly situated,

Plaintiffs,

v.

NEW PRIME INC.,

Defendant.

Civil Action No. 1:20-cv-11584-PBS

PLAINTIFFS' ASSENTED-TO FILING - PROPOSED ORDERS

As discussed at the final approval hearing on January 13, 2021, and pursuant to the Court's order of January 19, 2021, Plaintiffs hereby file the following documents:

- 1) Exhibit 1 is an amended version of the proposed Final Settlement Approval Order and Separate and Final Judgement, with the changes ordered by the Court on January 19, 2021 (in paragraph 5).
- 2) Exhibit 2 is the proposed Order Allowing Supplemental Notice to Certain Individuals in Settlement Class and for Preliminary Approval of Settlement for Newly

Discovered Individuals, with the scheduled date for the final approval hearing included at paragraph 9.

Plaintiffs respectfully request that the Court sign the proposed Orders attached as Exhibits 1 and 2.

Respectfully submitted,

DOMINIC OLIVEIRA,
on behalf of himself
and all others similarly situated,

By their attorneys,

/s/ Hillary Schwab
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Dated: January 22, 2021

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Hillary Schwab
Hillary Schwab