

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF IOWA**

**C.A.** through their next friend **P.A.**, **C.B.** through his next friend **P.B.**, and **C.C.** through his next friend **P.C.**, for themselves and those similarly situated,

**Plaintiffs,**

**v.**

**Kelly Garcia**, in her official capacity as Director of the Department of Health and Human Services.

**Defendant.**

C/A No. 4:23-cv-00009-SHL-HCA

**JOINT MOTION FOR PRELIMINARY  
APPROVAL OF CLASS SETTLEMENT  
AGREEMENT  
AND FOR OTHER RELIEF**

The Parties hereby move this Court for entry of an Order in the form set forth as Ex. 4 to the Motion, providing as follows:

- [1] Preliminarily approving the Class Action Settlement Agreement;
- [2] Approving the Notice Plan addressing the manner of providing notice to Class Members, and the proposed Notice to Class Members;
- [3] Setting a Hearing Date for a Fairness Hearing on the Motion for Final Approval of Settlement.

The Parties rely on and incorporate by reference the facts and legal arguments, as well as exhibits, set forth in the accompanying Memorandum of Points and Authorities in support of this Motion.

DATED: January 15, 2025

[Signature Page Follows]

Respectfully Submitted,

## **DISABILITY RIGHTS IOWA**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the Clerk of Court on January 15, 2025 to be served by operation of the Court's electronic filing system upon all parties.

/s/ Stephanie Persson

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