

# **EXHIBIT 4**

**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 Iowa Department of Health and Human Services.

**Defendant.**

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

**(PROPOSED) ORDER PRELIMINARILY  
APPROVING  
CLASS ACTION SETTLEMENT,  
SETTING FINAL APPROVAL  
BRIEFING SCHEDULE AND HEARING  
DATE, AND APPROVING PROPOSED  
NOTICE AND DISTRIBUTION PLAN**

This matter having come before the Court on the Parties' Joint Motion for Preliminary Approval of Class Settlement Agreement, having been duly considered and for good cause shown, it is hereby:

**ORDERED THAT:**

1. The Settlement Agreement (ECF No. xx) is hereby preliminarily approved.
2. The Court approves the form and content of the proposed Class Notice attached to the Motion as Ex. 2.
3. The Court further approves the proposed Class Action Notice Plan, attached to the Motion as Ex. 3.
4. The Class Notice shall be distributed no later than thirty (30) days from entry of this Order, pursuant to the procedures described in the Class Action Notice Plan.

5. Class Members and other interested parties shall submit any comments or objections to the Settlement Agreement within five weeks of entry of the completion of the Notice Plan and distribution of Class Notice. Objections shall be submitted in accordance with the procedure contained in the Class Notice.
6. The Parties may file a brief (a) in support of final approval of the Settlement Agreement, and (b) addressing any objections and comments, within two weeks of the close of the objections period. The Plaintiffs will also submit to the Court all submissions objecting or in support of the Settlement within two weeks of the close of the objection period.
7. The Final Approval Hearing concerning approval of the Settlement Agreement and Plaintiffs' request for fees and costs will be held on \_\_\_\_\_ at \_\_\_\_\_.

Ordered this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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Stephen H. Locher  
U.S. District Judge