

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

GLEN GRAYSON, DOREEN MAZZANTI,  
DANIEL LEVY, DAVID MEQUET and  
LAUREN HARRIS, individually and on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY,

Defendant.

No. 3:13-cv-01799-WWE

(Consolidated Docket No.)

APRIL 30, 2020

**PLAINTIFFS' MOTION FOR CERTIFICATION OF THE SETTLEMENT CLASS  
AND FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Glen Grayson, Doreen Mazzanti, Daniel Levy, David Mequet, and Lauren Harris (collectively, "Plaintiffs"), individually and on behalf of the Settlement Class (as defined in the Settlement Agreement),<sup>1</sup> respectfully move this Court for entry of an order:

- (1) Approving the Settlement as set forth in the Settlement Agreement;
- (2) Certifying the Settlement Class;

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<sup>1</sup> Capitalized terms used herein are defined in the Settlement Agreement [Dkt. No. 358-1]. For the Court's convenience, another copy of the Settlement Agreement is attached as Exhibit A to the Declaration of Seth R. Klein submitted herewith.

- (3) Appointing Plaintiffs Glen Grayson, Doreen Mazzanti, Daniel Levy, David Mequet, and Lauren Harris as the Settlement Class Representatives; and
- (4) Appointing Hassan A. Zavareei, Esq. and Anna C. Haac, Esq. of Tycko & Zavareei LLP and Robert A. Izard, Jr., Esq., Seth R. Klein, Esq., and Mark P. Kindall, Esq. of Izard Kindall & Raabe LLP as Settlement Class Counsel.

In support of this Motion, Plaintiffs by their counsel represent that: (1) the Settlement Class has received full and fair notice of the Settlement in accordance with the Notice Plan approved by the Court in its Preliminary Approval Order [ECF No. 364]; (2) the Settlement Class meets the numerosity, commonality, typicality, adequacy, predominance and superiority requirements of Fed. R. Civ. P. 23(a) and (b)(3) and therefore should be certified; and (3) the Settlement is fair, reasonable and adequate and merits final approval.

In further support of this Motion, Plaintiffs have filed a Memorandum of Law, the Declaration of Seth R. Klein of Izard Kindall & Raabe LLP, the Declaration of Hassan Zavareei of Tycko & Zavareei LLP, and the Declaration of Cameron R. Azari of Epiq Class Actions & Claims Solutions, Inc. Plaintiffs will submit a [Proposed] Order and Final Judgment for the Court's consideration no later than June 29, 2020 (the date set by the Court for Plaintiff to respond to any objections), in anticipation of the Final Approval Hearing scheduled for July 16, 2020.<sup>2</sup>

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<sup>2</sup> As set forth in Plaintiffs' accompanying memorandum of law, to the extent that COVID-19 prevents an in-person hearing on the scheduled date, Plaintiffs respectfully request that, pursuant to ¶ 2 of the "Superseding General Order Re: Court Operations" issued in this District on April 27, 2020, the hearing be held by telephone or videoconference.

Dated: April 30, 2020

Respectfully submitted,

PLAINTFFS

By: /s/ Seth R. Klein \_\_\_\_\_  
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