

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

DOUGLAS S. CHABOT, et al.,  
Individually and on Behalf of All  
Others Similarly Situated,

Plaintiffs,

vs.

WALGREENS BOOTS ALLIANCE,  
INC., et al.,

Defendants.

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) Civ. Action No. 1:18-cv-02118-JPW  
)  
) CLASS ACTION  
)  
) LEAD PLAINTIFFS' MOTION FOR  
) FINAL APPROVAL OF SETTLEMENT  
) AND APPROVAL OF PLAN OF  
) ALLOCATION  
)  
)  
)  
)  
)  
)  
)

Lead Plaintiffs Douglas S. Chabot and Corey M. Dayton, by and through counsel, respectfully move the Court for an order (i) approving the terms and conditions of the Stipulation of Settlement dated October 18, 2023, ECF 307-1, as fair, reasonable, and adequate for settlement; and (ii) approving the proposed Plan of Allocation.

In support of this motion, Lead Plaintiffs submit herewith the Memorandum of Law in Support of Motion for Final Approval of Settlement and Approval of Plan of Allocation, the Declaration of David A. Knotts in Support of Settlement Motions, the Declaration of Ross D. Murray, and the Declarations of Lead Plaintiffs.

Proposed orders will be submitted with Lead Plaintiffs' reply submission on or before January 31, 2024, after the objection deadline for Class Members to object to the Settlement or Plan of Allocation has passed.

DATED: January 3, 2024

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
RANDALL J. BARON  
A. RICK ATWOOD, JR.  
DAVID A. KNOTTS  
TEO A. DOREMUS

A handwritten signature in black ink, appearing to be "David A. Knotts", written over a horizontal line.

DAVID A. KNOTTS

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*Local Counsel*

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on January 3, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Knotts

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# Mailing Information for a Case 1:18-cv-02118-JPW Chabot et al v. Walgreens Boots Alliance, Inc. et al

## Electronic Mail Notice List

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The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Mason Capital Master Fund, L.P.

,

Recovery Master, LLC

,

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

DOUGLAS S. CHABOT, et al.,	)	Civ. Action No. 1:18-cv-02118-JPW
Individually and on Behalf of All	)	
Others Similarly Situated,	)	<u>CLASS ACTION</u>
	)	LOCAL RULE 7.1 CERTIFICATION
Plaintiffs,	)	
	)	
vs.	)	
	)	
WALGREENS BOOTS ALLIANCE,	)	
INC., et al.,	)	
	)	
Defendants.	)	
_____	)	

Pursuant to Local Rule 7.1, I, David A. Knotts, Esq., do hereby certify that the Settling Parties' (Lead Plaintiffs and Defendants) positions regarding the subject matter of the Motion for Final Approval of Settlement and Approval of Plan of Allocation are memorialized in the Stipulation of Settlement dated October 18, 2023 (ECF 307-1) (the "Stipulation"). As reflected in the Stipulation, the Settling Parties jointly agree that the Settlement should be finally approved on the terms and conditions requested therein, and that Defendants take no position with respect to the Plan of Allocation. *See* Stipulation, ¶7.12.

DATED: January 3, 2024

ROBBINS GELLER RUDMAN  
& DOWD LLP  
RANDALL J. BARON  
A. RICK ATWOOD, JR.  
DAVID A. KNOTTS  
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