

IN THE IOWA DISTRICT COURT FOR LINN COUNTY

<p>BRANDI BELL individually, and BRANDIE KEEGAN, individually and on behalf of her minor child, E.S., both on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>C.R. PHARMACY SERVICES, INC. d/b/a CAREPRO HEALTH SERVICES,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. CVCV104303</p> <p>PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT</p>
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Plaintiffs Brandi Bell, individually, and Brandie Keegan, individually and on behalf of her minor child, E.S., (“Plaintiffs”) hereby move this Court to:

1. Preliminarily approve the Settlement described in the “Settlement Agreement” between Plaintiffs and Defendant C.R. Pharmacy Services, Inc. d/b/a CarePro Health Services (“CarePro” or “Defendant”), and the attachments thereto, including the Short Notice, the Long Notice, and the Claim Form, attached to the Declaration of Lynn A. Toops filed herewith in support of this Motion;
2. Conditionally certify the Settlement Class;
3. Appoint Brandi Bell, and Brandie Keegan, individually and on behalf of her minor child, E.S., as Class Representatives;
4. Appoint Lynn A. Toops of CohenMalad, LLP and John J. Nelson of Milberg Coleman Bryson Phillips Grossman, PLLC, as Settlement Class Counsel;

5. Approve a customary Short Form Notice to be mailed to Settlement Class Members (the “Short Notice”) in a form substantially similar to that attached as Exhibit A to the Settlement Agreement;

6. Approve a customary Long Form Notice (“Long Notice”) to be posted on the Settlement Website in a form substantially similar to the one attached as Exhibit B to the Settlement Agreement;

7. Direct Notice to be sent to the Settlement Class in the form and manner proposed as set forth in the Settlement Agreement and Exhibits A, B, and C thereto;

8. Appoint Eisner Advisory Group, LLC (“EAG”) as Notice Specialist and Claims Administrator;

9. Approve the use of a Claim Form substantially similar to that attached as Exhibit C to the Settlement Agreement; and

10. Set a hearing date and schedule for Final Approval of the Settlement and consideration of Settlement Class Counsel’s Motion for Award of Fees, Costs, Expenses, and Service Awards.

11. This Motion is based upon: (1) this Motion; (2) the Memorandum In Support of Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement; (3) the Settlement Agreement; (4) the Notices of Class Action Settlement (including Short Form and Long Form Notices); (5) the Claim Form; (6) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement; (7) the [Proposed] Order Granting Final Approval; (8) documents submitted by proposed Settlement Class Counsel in support of adequacy including the declarations of Lynn A. Toops and John J. Nelson; and (9) and other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: August 1, 2025

Respectfully submitted,

/s/ J. Barton Goplerud

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Counsel for Plaintiffs and the Putative Class

**Pro Hac Vice Pending*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was filed on this 1st day of August, 2025 via the Court's electronic filing system, which will serve copies to all counsel of record.

/s/ J. Barton Goplerud

Attorney for Plaintiff