

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

FORWARD MOMENTUM, LLC,)
et al.,)

Plaintiffs,)

v.)

TEAM HEALTH, INC., et al.,)

Defendants.)

CIVIL ACTION NO.:
2:17-cv-00346-WKW

**UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

COME NOW the “Class Representatives”, Forward Momentum, LLC, Argo Consulting, PC, Lisa M. Bundy, MD, LLC, Dr. Steven Bobo, Dr. Raymond J. Maguire, Dr. Landon E. Argo, Dr. Nima Bahraini, Dr. Dawn Donald, Dr. Roger D. Eiland, and Dr. Lisa M. Bundy, on behalf of themselves and the Class, in the above-styled action, and hereby move this Court for an order finally approving the class settlement (the “Settlement Agreement”) of the Plaintiffs’ Claims against Team Health LLC f/k/a Team Health, Inc. and Paragon Contracting Services, LLC f/k/a Paragon Contracting Services, Inc. (collectively “Defendants”) and certifying the Settlement Class for settlement purposes only.

The Class Representatives seek final approval of their Class and Settlement Agreement. The Class and other terms of the Settlement Agreement were agreed upon after several years of intense litigation and arm’s-length negotiations with the assistance of highly respected mediators.

The Settlement Agreement is fair, reasonable, adequate, and likely to warrant final approval under the Eleventh Circuit’s long standing class settlement fairness factors as well as

the requirements of Fed. R. Civ. P. 23(e)(2). Moreover, the Settlement Class satisfies and is certifiable under Fed. R. Civ. P. 23(a), and (b)(3). The Plan of Distribution of settlement proceeds and Notice should be approved because it is fair, adequate, and reasonable. No objections warrant disapproval of the Settlement.

In support of this Motion, the Class Representatives submit herewith their Memorandum of Law in Support of Unopposed Motion for Final Approval of Class Action Settlement, along with accompanying exhibits.

After the Court conducts its Final Approval Hearing on July 28, 2022, for these reasons, as well as those set forth in the supporting materials submitted herewith, the Class Representatives respectfully request that their Motion be granted, and that the Court should enter a final approval order in the form proposed as **Exhibit A** to the Memorandum.

RESPECTFULLY SUBMITTED,

/s/ D. G. Pantazis, Jr.

D.G. Pantazis, Jr.

Craig L. Lowell

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a Notice of Electronic Filing generated by CM/ECF on all counsel of record.

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