

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

AL'S DISCOUNT PLUMBING;
ACCURATE BACKFLOW AND
PLUMBING SERVICES, INC.;
HOMESTEAD HEATING &
PLUMBING, LLC; AIRIC'S
HEATING & AIR CONDITIONING,
INC.; PRIME SOURCE PLUMBING
& HEATING CORP.; RYAN
PLUMBING, INC.; MAZZOLA
PLUMBING HEATING & GAS
FITTING, INC.; SOUTH SHORE
HEATING AND PLUMBING, INC.;
ALL KNIGHT PLUMBING,
HEATING AND AIR
CONDITIONING, INC.; PLUMB
PERFECTION, LLC, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**INDIRECT PURCHASER PLAINTIFFS' NOTICE OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on December 17, 2020 at 11:00a.m. Eastern Standard Time, the Court will hold a hearing on Plaintiffs Al's Discount Plumbing; Accurate Backflow and Plumbing Services, Inc. Homestead Heating & Plumbing, LLC; Airic's Heating & Air Conditioning, Inc.; Prime Source Plumbing & Heating Corp.; Ryan Plumbing, Inc.; Mazzola Plumbing, Heating & Gas Fitting, Inc.; All Knight Plumbing Heating and Air Conditioning, Inc.; and Plumb Perfection LLC's (collectively "Plaintiffs") Motion for Final Approval of the Class Action Settlement, attached as Exhibit 1 to the accompanying Memorandum of Points and Authorities. Plaintiffs' respectfully request that the Court enter an order and judgment of final approval, on the grounds that the Settlement is fair, adequate, and reasonable.

Plaintiffs' motion is based on this notice of motion; the accompanying Memorandum of Points and Authorities; the Declaration of Elizabeth C. Pritzker; and the Declaration of Cameron R. Azari on behalf of the Settlement Administrator; and all exhibits and attachments thereto, including the Settlement Agreement; the [Proposed] Order; and all other papers filed and proceedings had in this action.

STATEMENT OF ISSUES TO BE DECIDED

1. Whether the Settlement was fair, reasonable and adequate thereby warranting final approval;
2. Whether the Settlement Classes provisionally approved in the order granting preliminary approval (ECF 99) should be finally certified;
3. Whether the appointment of the nine named Plaintiffs as Settlement Class Representatives should be finally approved;
4. Whether, under Fed. R. Civ. P. 23(g), Interim Class Counsel for the preliminary-certified Settlement Class should be appointed Class Counsel of

the certified Class.

5. Whether final judgment approving the Settlement should be entered.

Dated: November 13, 2020

Respectfully Submitted,

**OBERMAYER REBMANN
MAXWELL & HIPPEL LLP**

/s/ Walter W. Cohen

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*Interim Co-Lead Counsel for the
Indirect Purchaser Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2020, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

/s/ Walter W. Cohen