

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARK NORTON, DASHKA LOUIS,
CAROLINE MITCHELL, NANCY
BARTLETT and AZILDA CORDAHI,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MASS GENERAL BRIGHAM
INCORPORATED, THE BOARD OF
DIRECTORS OF MASS GENERAL
BRIGHAM INCORPORATED, THE
INVESTMENT COMMITTEE OF MASS
GENERAL BRIGHAM INCORPORATED
and JOHN DOES 1-30.

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT, APPROVAL OF FORM AND MANNER OF SETTLEMENT
NOTICE, AND SCHEDULING OF A FAIRNESS HEARING**

Plaintiffs, Mark Norton, Dashka Louis, Caroline Mitchell, Nancy Bartlett, and Azilda Cordahi, (together, “Plaintiffs”), respectfully submit this Unopposed Motion for Preliminary Approval of the Class Action Settlement Agreement entered into with Defendants¹ (the “Settlement” or “Settlement Agreement”), Approval of Form and Manner of Settlement Notice, and Scheduling of a Fairness Hearing and respectfully move this Court for an Order granting the relief sought. The grounds for this motion are set forth in Plaintiffs and their Counsel’s declarations and the memorandum of law in support of this motion, which are submitted herewith.

¹ “Defendants” collectively refers to the Mass General Brigham Incorporated, (“Mass General”), the Board of Directors of the Mass General Brigham Incorporated (“Board”), and the Investment Committee of Mass General Brigham Incorporated, (the “Committee”).

A Proposed Order is submitted herewith.

Dated: April 17, 2025

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

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Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2025, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: Mark K. Gyandoh
Mark K. Gyandoh, Esq.